

# Exhibit A



Kevin Dooley Kent  
Two Commerce Square  
2001 Market Street  
Suite 2620  
Philadelphia, PA 19103  
kkent@clarkhill.com

Invoice: 1506535  
Date: 11/13/2024  
Client: L5848  
Matter: 501765

Matter Name: Empire Holdings Group LLC, et al.

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**LEGAL SERVICES RENDERED AND COSTS ADVANCED THROUGH OCTOBER 31, 2024**

Total Fees:	\$	396,104.94
Total Expenses:		6,354.46
<b>Total Due This Invoice:</b>	<b>\$</b>	<b>402,459.40</b>



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FOR LEGAL SERVICES RENDERED in connection with the above matter.

#### TIME AND FEE SUMMARY

Name	Initials	Rate	Hours	Amount
Kevin Kent	KK	\$722.50	156.10	112,782.25
Robin Weiss	RW	\$562.50	180.10	101,306.25
Vanessa Huber	VH	\$436.50	261.70	114,232.05
Madison Mull	MM	\$265.00	83.10	22,021.50
Justin Russell	JR	\$270.00	132.10	35,667.00
Michael J. Boland	MJB	\$352.75	6.50	2,292.89
Ching Chew	CC	\$270.00	28.90	7,803.00
			<b>Total</b>	<b>848.50 \$ 396,104.94</b>

#### DETAIL OF LEGAL SERVICES

Date	Initials	Description	Hours
09/16/24	VH	Draft list of all topics and information to gather from receivership defendant for expected FTC receivership and send same to K. Kent and M. Guernsey for review (NO CHARGE .20).	0.00
09/16/24	VH	Email correspondence with K. Kent and M. Guernsey regarding action items for preparation for expected FTC receivership (NO CHARGE .20).	0.00
09/16/24	VH	Draft notice letter templates to banks and other entities for expected FTC receivership appointment and send same to K. Kent and M. Guernsey for review (NO CHARGE 2.20).	0.00
09/16/24	VH	Draft 754 Notice and cover letter to federal district courts for expected FTC receivership appointment and send same to K. Kent and M. Guernsey for review (NO CHARGE 1.10).	0.00
09/16/24	VH	Review and update action items list for expected FTC receivership and send updated action items to K. Kent and M. Guernsey (NO CHARGE .70).	0.00
09/16/24	VH	Research and Prepare 754 Notice civil cover sheet and tax Form 56 for expected FTC receivership (NO CHARGE 1.60).	0.00



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09/17/24	KK	Review updated action items list, witness interview scripts, summary of data from FTC and related materials; emails with M. Guernsey and V. Huber [REDACTED] (NO CHARGE 2.00).	0.00
09/17/24	VH	Review and update action items for expected FTC receivership and assist K. Kent with receivership credential documentation for same (NO CHARGE 1.50).	0.00
09/17/24	VH	Review sample court order appointing receiver in FTC action, assess scope of receiver authority for expected appointment of K. Kent as receiver in forthcoming FTC receivership, and email K. Kent and M. Guernsey regarding same (NO CHARGE 2.00).	0.00
09/17/24	VH	Review and revise notice letter templates to banks and other entities for expected FTC receivership appointment in accordance with K. Kent feedback on same (NO CHARGE .20).	0.00
09/17/24	VH	Confer with R. Weiss regarding preparation for forthcoming FTC receivership and strategy for 754 Notices related to same (NO CHARGE .80).	0.00
09/17/24	VH	Review and analyze exhibits received from FTC for information necessary for preparation for forthcoming FTC receivership and send K. Kent and M. Guernsey notes related to same (NO CHARGE 2.50).	0.00
09/18/24	JR	Review pacer regarding FTC filings (NO CHARGE 1.20).	0.00
09/18/24	KK	Correspondences with M. Shanahan re first day items.(NO CHARGE .10).	0.00
09/18/24	KK	Meet with M. Guernsey and V. Huber to review fact and legal issues based on materials just received from FTC and update plan of action (NO CHARGE 2.30).	0.00
09/18/24	KK	Begin review of filings; meetings and emails with M. Guernsey and V. Huber re updates to action items and plan of action based on same (NO CHARGE 2.50).	0.00
09/18/24	KK	Review update memoranda re questions for defendant, action items and fact issues (NO CHARGE .40).	0.00
09/18/24	MM	Correspondence with K. Kent, M. Guernsey, and V. Huber about case strategy (NO CHARGE 1.40).	0.00
09/18/24	VH	Review complaint and emergency motion for a TRO (NO CHARGE .50).	0.00



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09/18/24	VH	Email R. Weiss regarding summary of status on action and hearing scheduled on emergency motion for a TRO and appointment of a receiver (NO CHARGE .30).	0.00
09/18/24	VH	Email correspondence with A. Grier regarding registered office address information of Empire Realty Holdings LLC (NO CHARGE .10).	0.00
09/18/24	VH	Confer with K. Kent, M. Guernsey, and A. Grier regarding forthcoming hearing on motion for preliminary injunction and appointment of receiver and general strategy in light of same (NO CHARGE .80).	0.00
09/18/24	VH	Confer with M. Guernsey regarding strategy [REDACTED] [REDACTED] (NO CHARGE 010).	0.00
09/18/24	VH	Review documents from M. Shanahan regarding properties owned by P. Prusinowski and property conveyed to Empire Realty Holdings LLC, conduct additional research related to same, and email K. Kent, M. Guernsey, and M. Shanahan regarding same (NO CHARGE .40).	0.00
09/18/24	VH	Confer with M. Mull regarding preparation and mailing of all 754 Notices to all federal district courts regarding appointment of receiver (NO CHARGE .50).	0.00
09/18/24	VH	Meeting with K. Kent, M. Guernsey, and M. Mull regarding preparation and strategy for receivership investigation and collection of assets (NO CHARGE 2.30).	0.00
09/18/24	VH	Review and revise questions to P. Prusinowski, notice letters to banks and entities of appointment of receiver, 754 Notice documents, and action items in preparation for receivership investigation and collection of assets (NO CHARGE 1.50).	0.00
09/19/24	JR	Review docket and new forward pleadings to K. Kent, M. Guernsey, V. Huber, and M. Mull (NO CHARGE .50).	0.00
09/19/24	KK	Correspondences with FTC re hearing (NO CHARGE .10).	0.00
09/19/24	KK	Conference call with M. Guernsey and V. Huber re Court order, hearing, changes to action plan based on same (NO CHARGE .50).	0.00
09/19/24	KK	Review order; correspondences re impact of same on action items with M. Guernsey et al. (NO CHARGE 020).	0.00
09/19/24	KK	Meeting with M. Guernsey and V. Huber re filings and duties in proposed order (NO CHARGE .40).	0.00



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09/19/24	VH	Email correspondence with S. Jones, J. Russell, and M. Mull regarding preparation of 754 notices to all federal district courts upon expected receivership appointment (NO CHARGE .20).	0.00
09/19/24	VH	Confer with R. Weiss regarding overview of court proceedings in FTC action and all work prepared in relation thereto for expected receivership appointment (NO CHARGE .30).	0.00
09/19/24	VH	Review and revise notice letters to banks and entities regarding receivership appointment and draft consent directive (NO CHARGE 1.10).	0.00
09/19/24	VH	Review proposed order for a TRO, asset freeze, and appointment of a receiver, compare same to sample TRO order, and analyze scope of receiver authority related to investigation and seizing assets (NO CHARGE .90).	0.00
09/19/24	VH	Confer with K. Kent and M. Guernsey regarding rescheduled hearing on motion for a TRO and appointment of a receiver and strategy [REDACTED] (NO CHARGE 1.20).	0.00
09/20/24	JR	Review FTC docket and download pleadings.	0.30
09/20/24	JR	Assemble copies order for distribution, research regarding mail forwarding and meeting with K. Kent, R. Weiss, and M. Mull regarding next steps.	2.60
09/20/24	JR	Review court list and confer with M Mull re FedEx labels to court (NO CHARGE .30).	0.00
09/20/24	KK	Continue to review filings.	1.50
09/20/24	KK	Meetings with FTC in connection with receivership; initial meeting with defendant and defendant's counsel; review pleadings and fact information filed in connection with TRO request; meeting with R. Weiss, M. Mull and J. Russell re action items re order service, 754 notices, legal decisions re same, analysis of business operations, and related topics; multiple correspondences with FTC re assets and fact issues.	5.50
09/20/24	MB	Correspond and confer with K. Kent [REDACTED] (NO CHARGE .60).	0.00
09/20/24	MM	Prep 754 notices, confer with K. Kent and R. Weiss about strategy of case, prep notices to banks/entities, correspondence to banks/entities regarding assets frozen and TRO	6.30



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09/20/24	RW	Appear at courthouse for hearing on temporary restraining order and motion for appointment of receiver.; meet with K. Kent, counsel for FTC, S. Freeland, P. Prusinowski (NO CHARGE 6.50).	0.00
09/20/24	RW	Meet with K. Kent, M. Mull and J. Russell to address and handle immediate action items and notices.	3.00
09/20/24	VH	Confer with R. Weiss regarding defendants' response in opposition to the FTC's emergency motion for a TRO and action items upon receivership appointment (NO CHARGE .10).	0.00
09/21/24	JR	Begin update of account passwords.	2.00
09/21/24	JR	Phone call with R. Weiss regarding password spreadsheet.	0.10
09/21/24	KK	Correspondences with defendant and his counsel, J. Russell and R. Weiss re financial and other accounts, accessing same, other company personnel; phone calls and correspondences with R. Weiss and J. Russell re same; review spreadsheet re accounts.	1.10
09/21/24	KK	Conference call with M. Shanahan and R. Weiss re action items based on initial information learned.	0.30
09/21/24	KK	Asset protection activities at bank branch and mail diversion activities at Post Office; meeting with bank official; meeting with postmaster; complete forms; travel to Jamison re same; correspondence to Court.	3.60
09/21/24	RW	Travel to TD Bank branches to serve TRO/Receivership Order and communicate with branch managers regarding same (NO CHARGE 2.50).	0.00
09/21/24	RW	Review order and update action items list, address bank access issues.	0.70
09/21/24	RW	Prepare and send email to defendants regarding most urgent information requests; call with K. Kent regarding same.	0.40
09/21/24	RW	Handle initial employee reach-out and service of TRO and Receivership Order.	0.30
09/21/24	RW	Prepare and file notice of appearance (NO CHARGE .30).	0.00



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09/21/24	VH	Confer with R. Weiss regarding overview of initial actions and investigation upon receivership appointment and next action items regarding 754 notices to federal district courts, interviews of P. Prusinowski and Empire employees, and forthcoming report to the court for preliminary injunction hearing.	0.60
09/21/24	VH	Email correspondence with K. Kent and R. Weiss regarding 754 notices to be sent out, Empire Realty relationship to Empire Holdings, and notice of receivership to employee D. Wilson.	0.20
09/22/24	JR	Phone call with R. Weiss regarding password logins.	0.20
09/22/24	JR	multiple phone calls to K. Kent, R. Weiss, and R. Kaplan regarding accounts.	2.10
09/22/24	JR	Setup box folder and transmit documents for Alvarez & Marsal's review.	2.00
09/22/24	JR	multiple phone calls to P. Prusinowski regarding security codes for account access.	1.50
09/22/24	JR	Continue password update for accounts.	4.00
09/22/24	KK	Multiple emails with FTC re data and assets; Multiple phone calls and correspondences with R. Weiss and J. Russell re corporate accounts and records; emails with defendant and his counsel re company personnel; phone call and correspondences with COO; phone call to accountant.	3.80
09/22/24	KK	Phone calls and correspondences with R. Weiss and J. Russell re accounts, securing data, analysis of operations and related tasks; emails with R. Weiss, defendant, defendants' counsel and FTC re devices and data; phone calls with R. Weiss re same; phone call to defendants' counsel.	1.20
09/22/24	MM	Review Complaint and TRO to address how to handle Empire's social media accounts	2.40
09/22/24	MM	Review Empire's website [REDACTED]	1.30
09/22/24	RW	Calls with J. Russell regarding account access and transfer of information to Mike Shanahan.	0.50
09/22/24	RW	Call with K. Kent regarding immediate action items.	0.30



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09/22/24	RW	Emails regarding meeting and turnover of cell phone, laptop, and email.	0.20
09/22/24	RW	Calls with K. Kent and attempt to call accountant and COO of company regarding financial and operational issues.	0.20
09/22/24	RW	Communications with J. Russell, K. Kent, FTC team, and defendant regarding various access and preservation issues.	3.60
09/22/24	RW	Calls with J. Russell, FTC and K. Kent to discuss document access and download issues.	0.90
09/22/24	VH	Confer with R. Weiss regarding 754 notice research and related strategy and forthcoming Empire employee interviews.	0.10
09/22/24	VH	Conduct legal research [REDACTED] [REDACTED]	0.50
09/22/24	VH	Conduct legal research [REDACTED] [REDACTED]	0.30
09/23/24	JR	Meeting with V. Huber, K. Kent, and R. Weiss regarding new action items	1.00
09/23/24	JR	Phone call with R. Kaplan regarding accounts.	0.10
09/23/24	JR	Meeting with V. Huber regarding paypal account and amex account.	0.80
09/23/24	JR	Continue to update of account logins.	0.80
09/23/24	JR	Review ClickFunnels website regarding access and email findings to R. Weiss, C. Chew, V. Huber, and M. Mull.	0.20
09/23/24	JR	Review youtube account and emails to/from RSW regarding account access	0.50
09/23/24	JR	Meeting with K. Kent, R. Weiss, V. Huber, and M. Mull	1.30
09/23/24	JR	Meet with P. Prusinowski regarding account information.	0.40
09/23/24	JR	analyze TD account statements for box shared folder.	0.20
09/23/24	JR	Phone call with R. Kaplan regarding Basestamp and Google account data.	0.40



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09/23/24	JR	Meeting with R. Weiss and A. Hussain re Empire Holding Group LLC and account access	1.50
09/23/24	JR	Review google account data download status.	0.20
09/23/24	JR	review and save FTC notices.	0.20
09/23/24	KK	Emails re post office box, with post-master and internally; multiple phone calls and correspondences with FTC, banks, payment processors, et al.; fact investigation re defendants' operations; meetings with team re same; conference call with defendants' counsel; follow-up calls and correspondences with defendants' counsel; review material from team [REDACTED]; interview of COO; follow-up emails and review of online materials re same; correspondences with bank re safe deposit box(es); phone calls and correspondences re back up plans for immediate payments; correspondences with FTC re Storefunnels; review information from Storefunnels re payment; review initial information from defendants re contractors; correspondences with FTC and ZwillGen and similar companies receiving TRO notice; emails with defendants' counsel re operational issues; review responses to preservation notices / notices of TRO; correspondences and phone calls with FTC and internal team re same; emails with Simovoly re Storefunnels.	11.20
09/23/24	MM	Correspondence regarding Empire's social media accounts.	0.20
09/23/24	MM	Correspondence with V. Huber, K. Kent, J. Russell, and R. Weiss regarding case strategy.	1.30
09/23/24	MM	Draft and mail 754 Notices to District Courts.	0.80
09/23/24	MM	Correspondence with V. Huber and Defendant regarding function of Defendant's websites.	1.60
09/23/24	RW	Meet with K. Kent and V. Huber to discuss immediate action items and next steps.	2.40
09/23/24	RW	Email defense counsel regarding passcodes for computer and cell phone.	0.10
09/23/24	RW	Strategy and action item meeting with K. Kent, V. Huber, M. Mull, and J. Russell.	1.30
09/23/24	RW	Calls with K. Kent regarding next steps and action items.	1.50



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09/23/24	RW	Meet with COO, K. Kent and J. Russell via zoom.	1.20
09/23/24	RW	Call with K. Kent and FTC team regarding operations issues.	0.70
09/23/24	RW	Address various issues relating to payment requests, bank account records, and responses to notices of TRO Order.	0.60
09/23/24	RW	Call with V. Huber regarding next steps and immediate action items.	0.40
09/23/24	RW	Communications with defendants, defense counsel, and team for fact and document gathering.	1.30
09/23/24	VH	Review and update tax form 56 for Empire Holdings and confer with R. Weiss regarding same.	0.20
09/23/24	VH	Determine issue regarding recurring payment to back end support staff contractors from PayPal and American Express and confer with J. Russell regarding same.	1.70
09/23/24	VH	Attend Zoom call with K. Kent, R. Weiss, M. Mull, and J. Russell regarding case status and strategy and pending action items.	1.30
09/23/24	VH	Attend Zoom call with P. Prusinowski, M. Mull, and C. Chew regarding operation of Click Funnels and Store Funnels websites.	1.30
09/23/24	VH	Confer with M. Mull regarding strategy [REDACTED]	0.20
09/23/24	VH	Confer with J. Russell regarding logins to Store Funnels and Click Funnels.	0.10
09/23/24	VH	Conduct investigation of defendants' business operations and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	4.90
09/23/24	VH	Confer with R. Weiss regarding overview of communications with P. Prusinowski [REDACTED]	0.40
09/24/24	JR	Team meeting with KDK C. Ching, RSW, and V. Huber (NO CHARGE 1.90).	0.00
09/24/24	JR	call with WSFS regarding account opening.	0.40



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09/24/24	JR	Teams meeting with M. Shanahan and T. Gosau regarding accounts.	0.20
09/24/24	JR	Emails to/from R. Weiss regarding FTC and Defendant Laptop and Cell Phone.	0.10
09/24/24	JR	Review records and forward bond information to K. Kent and K. Walsh for review.	0.50
09/24/24	JR	Phone call with R. Kaplan regarding data process and forensics; communicate with R. Weiss regarding accounts and laptop and phone call to R. Kaplan regarding google drive and admin access.	0.60
09/24/24	JR	Emails to/from R. Weiss, C. Chew, et al. regarding ClickFunnels website.	0.10
09/24/24	JR	Attend team zoom strategy call (NO CHARGE .30).	0.00
09/24/24	JR	Review Action Items list and begin download basecamp and google documents.	1.70
09/24/24	JR	Phone calls to and from R. Weiss regarding account access	0.70
09/24/24	JR	Update google admin account and help scout account.	0.70
09/24/24	JR	Communicate with KDK regarding logins	0.10
09/24/24	JR	Emails to/from R. Weiss regarding list of accounts.	0.50
09/24/24	JR	Review Store Funnel website for issues and email findings to R. Weiss, K. Kent, V. Huber, C. Chew, M. Mull.	0.30
09/24/24	KK	Correspondences with defendant and A. Hussain re operational issues; correspondences with R. Weiss et al. re action items re operations and various accounts / access matters, fact investigation; calls and correspondences with defendants' counsel and FTC; review discovery from defendants; correspondences with Storefunnels re continued service; review correspondence from Schwab re accounts; emails with R. Weiss and V. Huber [REDACTED]; correspondences with Truist; correspondences and phone calls with defendants' counsel re contact with contractors; correspondences with FTC and R. Weiss re Dropton; review info from R. Weiss [REDACTED]	8.90
09/24/24	MM	Review case strategy regarding TRO and asset freeze.	1.90



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09/24/24	MM	Draft summary regarding Temporary Restraining Order and Asset Freeze.	0.90
09/24/24	RW	Action and status items meeting with team.	2.00
09/24/24	RW	Meet with M. Shanahan and T. Gosau [REDACTED] [REDACTED]	0.50
09/24/24	RW	Call with K. Kent and FTC regarding various immediate operational and investigation-related issues.	1.20
09/24/24	RW	Address various immediate action items pertaining to operations and information gathering.	2.50
09/24/24	RW	Communicate with team [REDACTED]	0.10
09/24/24	RW	Prepare updated immediate action items list.	0.40
09/24/24	RW	Team call to discuss new action items (NO CHARGE .30).	0.00
09/24/24	RW	Meet with P. Prusinowski, COO, K. Kent, C. Chew and defense counsel to discuss company operations.	1.40
09/24/24	RW	Address ongoing access and financial analysis issues.	1.00
09/24/24	RW	Review Capital One document request response.	0.10
09/24/24	RW	Review email from COO regarding dropship access issues and communicate with K. Kent and J. Russell regarding same.	0.20
09/24/24	RW	Prepare list of account information available and still needed and email M. Shanahan and J. Russell regarding same.	0.30
09/24/24	VH	Conduct legal research [REDACTED] [REDACTED]	1.40
09/24/24	VH	Complete tax form 56 for Empire Holdings and coordinate with mailroom to mail same to the IRS.	0.50
09/24/24	VH	Conduct investigation of defendants' business operations and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	7.20



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09/25/24	JR	Meeting with C. Brown regarding data imaging for phone and laptop regarding P. Prusinowski	3.90
09/25/24	JR	Zoom call with R. Weiss and R. Kaplan regarding account logins.	0.90
09/25/24	JR	Draft WSFS Bank documents regarding new account.	0.90
09/25/24	JR	Phone calls with T. Gosau regarding QuickBooks access.	0.20
09/25/24	JR	Download and save basecamp and Monday Data.	1.00
09/25/24	KK	Phone call with R. Weiss re defendants' filings and [REDACTED].	0.40
09/25/24	KK	Review defendants' motion to modify TRO and motion to dismiss.	0.60
09/25/24	KK	Multiple correspondences with defendants' representatives, defendants' counsel, FTC, FTC data team, and internal team re receivership operations, customer matters, data collection, account access; correspondences and phone calls with team members R. Weiss, V. Huber and M. Mull re same; review additional responses from banks; correspondences with Simvolvy re Storefunnels.net.	3.50
09/25/24	KK	Correspondences with FTC re experts; Review information from defendants' COO and correspondences with same re additional information needed; review Clickfunnels sworn statement in connection with TRO.	0.50
09/25/24	KK	Attend to banking matters at TD Bank including meeting with bank representatives and inspection/logging of safe deposit box; meeting with Defendant Prusinowski in Jamison re turnover of additional materials including documents and safe deposit box keys; phone calls and correspondences with defendants' counsel; multiple phone calls/conference calls with R. Weiss and V. Huber re action items, [REDACTED] [REDACTED] [REDACTED] (1.6 no charge); emails re key documents received from defendant Prusinowski; emails re contents of safe deposit box and access data; roundtrip travel to Bucks County regarding the foregoing.	4.30
09/25/24	MM	Correspondence with Click Funnels regarding preservation of ecommerceempirebuilders.com	0.50



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09/25/24	MM	Review case strategy [REDACTED]	1.30
09/25/24	MM	Draft FTC summary and analysis [REDACTED] [REDACTED]	3.80
09/25/24	RW	Call with K. Kent and V. Huber regarding strategy and action items (NO CHARGE 1.60).	0.00
09/25/24	RW	Meet with FTC team, K. Kent, V. Huber, and Alvarez and Marsal team regarding various operational and financial issues.	1.10
09/25/24	RW	Meet with FTC team to discuss access and document download issues.	0.50
09/25/24	RW	Review motion to dismiss and motion to modify TRO.	0.20
09/25/24	RW	Continued analysis of business operations and handling of action items relating to same.	4.20
09/25/24	RW	Call with K. Kent regarding action items.	0.40
09/25/24	VH	Telephone call with TD Bank legal department regarding notice of receivership and receiver's access to defendant's safe deposit box.	0.60
09/25/24	VH	Telephone call with S. Swiat regarding follow up questions regarding continuation of business for existing Empire customers.	0.10
09/25/24	VH	Telephone call with S. Swiat regarding role within and work performed for Empire.	0.50
09/25/24	VH	Telephone call with Capital Bank and Trust employee regarding notice of receivership and related request for information.	0.10
09/25/24	VH	Attend Teams call with the FTC and A&M regarding financial information and overview for Receivership accounting of defendants' assets.	0.80
09/25/24	VH	Draft template letter to banks regarding transfer of funds to Receivership account pursuant to TRO Order.	0.80
09/25/24	VH	Conduct investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	8.30
09/26/24	JR	Continue to review and draft WSFS account documents.	2.20



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09/26/24	JR	Phone call with RSW regarding login passwords.	0.20
09/26/24	JR	Communicate with T. Gosau regarding Bank Accounts.	0.30
09/26/24	JR	Call with R. Weiss, V. Huber, and K. Kent regarding account access	0.30
09/26/24	JR	Review waveapp account regarding account activity and email to R. Weiss regarding findings.	0.20
09/26/24	JR	Download and save file regarding Financial Disclosure Forms.	0.50
09/26/24	JR	Phone call with V. Huber and meeting with V. Huber and K. Phy regarding court filings.	0.70
09/26/24	KK	Multiple communication and calls with financial institutions, payment processors re assets (NO CHARGE 2.50).	0.00
09/26/24	KK	Review Order re emergency motion	0.10
09/26/24	KK	Emails with V. Huber re bank letters; emails with R. Weiss re additional fact issues and action items.	0.40
09/26/24	KK	Meeting with FTC and expert; correspondences with FTC; correspondences with defendants' representatives re operational issues and fact issues; review and revise draft correspondences to customers, to opposing counsel, to FTC counsel; review transcript from hearing; meeting with R. Weiss, V. Huber, M. Mull and J. Russell re same and action items stemming from day's activities; correspondences with FTC and defendants' counsel re financial data.	7.90
09/26/24	MM	Correspondence with financial entities regarding Notice of TRO and Asset Freeze	0.30
09/26/24	MM	Draft and mail 754 Notices to District Courts	0.50
09/26/24	MM	Review case strategy regarding social media accounts, active websites, and financials.	1.80
09/26/24	MM	Assess social media platforms and [REDACTED]	0.60
09/26/24	MM	Review Simvolvy website; correspondence with V. Huber and R. Weiss [REDACTED].	1.10



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09/26/24	RW	Review TRO hearing transcript.	0.20
09/26/24	RW	Meet with K. Kent, V. Huber, A. Grier and R. Hlavac to discuss business operations, investigation and analysis.	1.60
09/26/24	RW	Continue investigation of defendants' business operations and assets and communicate with K. Kent, V. Huber, M. Mull, and J. Russell regarding same and strategy related thereto.	11.00
09/26/24	VH	Attend Teams call with K. Kent, R. Weiss, A. Grier, R. McAuliffe, and R. Hlavac regarding defendants' business model and operations.	1.70
09/26/24	VH	Review TRO hearing transcript.	0.30
09/26/24	VH	Telephone call with Empire customer regarding overview of receivership and experience with Ecommerce product purchase and expectations.	0.60
09/26/24	VH	Review and revise draft letter to the FTC and defendants regarding intent to deactivate social media and place notice of receivership on Ecommerce website and send updated draft to K. Kent and R. Weiss for review.	0.30
09/26/24	VH	Review and revise letters to entities regarding notice of appointment of receiver and request for information and send updated letters to M. Mull to finalize and serve.	0.40
09/26/24	VH	Draft letter to Charles Schwab requesting balance transfer to receivership account and send draft to K. Kent for review.	0.50
09/26/24	VH	Email correspondence with M. Shanahan and T. Gosau [REDACTED] [REDACTED]	0.30
09/26/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	9.80
09/27/24	JR	Phone call with T. Gosau regarding Storefunnels.	0.10
09/27/24	JR	Review waveapp account regarding transaction.	0.50
09/27/24	JR	Attend zoom meeting regarding updates.	0.20



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09/27/24	JR	Emails to/from A. Maldonado with WSFS Bank and review, finalize documents regarding Account opening.	1.00
09/27/24	JR	Continue to review accounts and update passwords.	3.30
09/27/24	JR	Emails to/from R. Kaplan regarding google accounts and upload of data to FTC portal.	0.80
09/27/24	KK	Multiple correspondences with FTC re fact issues; emails with team [REDACTED]; emails with R. Weiss et al re additional accounts to access; work on bank set up and correspondences with banks holding frozen funds; review data re feedback from customer outreach; correspondences re follow-up; emails re wave account and nature of payments, [REDACTED]; emails with R. Weiss and V. Huber [REDACTED]; [REDACTED]; correspondences with counsel re same; multiple phone calls and correspondences with opposing counsel and R. Weiss re data collection issues re personal account, fact investigation issues, and related matters; meeting with team [REDACTED]; [REDACTED]; emails with A&M [REDACTED]; attend to matters at TD Bank Center City location re closing accounts and transferring to receivership account; meeting with TD Bank representatives re same; correspondences and phone calls with TD Bank and WSFS; review draft response to motion to amend receiver order.	9.50
09/27/24	KK	Phone call and correspondences with M. Boland and opposing counsel re data collection from defendants' gmail account; emails with R. Weiss re same.	0.50
09/27/24	MJB	Calls with V. Huber and K. Kent regarding preservation and collection of Peter Prusinowski Gmail account; initiate emails communications with R. Poteet from Gordan Rees regarding next steps of regarding preservation and collection of Peter Prusinowski Gmail account.	0.80
09/27/24	MM	Draft Notice of TRO and Asset Freeze to additional entities, correspondence with entities regarding Notices.	0.80
09/27/24	MM	Review BaseCamp communications between employees and customers.	0.40
09/27/24	MM	Review Empire Holdings Group payment platforms for security purposes.	0.40
09/27/24	MM	Review Empire's financials on Slack and Stripe pertaining to payments made after asset freeze.	1.40



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09/27/24	MM	Investigate social media accounts and draft legal analysis [REDACTED] [REDACTED]	2.10
09/27/24	RW	Meet with K. Kent, V. Huber, and FTC team to discuss cell phone, website, and other access issues.	0.90
09/27/24	RW	Prepare proposed notice regarding social media and website alteration and/or removal.	0.80
09/27/24	RW	Prepare response to motion to amend TRO Order and email team regarding same.	0.50
09/27/24	RW	Continued outreach to employees and customers and communications with K. Kent, V. Huber, J. Russell, and M. Mull to understand and analyze business operations and customer support needs, and determine next steps for same.	8.90
09/27/24	VH	Attend Teams call with K. Kent, R. Weiss, A. Grier, and R. McAuliffe regarding deactivation of defendants' social media and considerations related to same.	0.90
09/27/24	VH	Revise and finalize letter to Charles Schwab requesting balance transfer to receivership account and send same to Charles Schwab.	0.20
09/27/24	VH	Draft letter to P. Hoppenfeld regarding notice of receivership and TRO Order and preservation obligations related to same and send draft to K. Kent and R. Weiss for review.	0.30
09/27/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	7.50
09/27/24	VH	Telephone calls with Empire customer regarding overview of receivership and experience with Ecommerce product purchase and expectations.	2.70
09/27/24	VH	Review and revise draft notice from the Receiver regarding website and social media and send updated draft to K. Kent and R. Weiss for review.	0.30
09/27/24	VH	Review and revise Receiver's response to Defendants' motion to amend TRO Order and send updated draft to K. Kent and R. Weiss for review.	0.30



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09/28/24	KK	Correspondences and phone call with post office; emails with R. Weiss and V. Huber [REDACTED] [REDACTED]	0.40
09/28/24	KK	Phone call and correspondences with R. Weiss re fact issues, [REDACTED] [REDACTED], follow-up with defendants re fact issues, [REDACTED], and related action items; [REDACTED] [REDACTED]; emails with R. Weiss and V. Huber [REDACTED]; review secondary materials re same; follow-up correspondences with TD Bank.	4.90
09/28/24	KK	Phone calls and correspondences with TD Bank re wire transfers.	0.50
09/28/24	KK	Emails with R. Weiss and defendants' counsel re facebook accounts.	0.20
09/28/24	KK	Correspondences and phone calls with R. Weiss [REDACTED] [REDACTED]; review and comment on draft correspondence re same and [REDACTED] [REDACTED].	0.40
09/28/24	KK	Zoom meeting with receivership team [REDACTED] [REDACTED]	1.30
09/28/24	MJB	Calls and email with R. Poteet from Gordan Rees regarding preservation and collection of Peter Prusinowski Gmail account per request of K. Kent.	1.70
09/28/24	RW	Call with K. Kent regarding handling of business operations and immediate action items.	1.60
09/28/24	RW	Continue investigation of defendants' business operations and assets, including customer and back-office staff reach-out, and communicate with K. Kent, V. Huber, and accounting team regarding same and strategy related thereto.	4.40
09/28/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent and R. Weiss regarding same and strategy related thereto.	6.60
09/28/24	VH	Revise and finalize letter to P. Hoppenfeld regarding notice of receivership and preservation obligations.	0.20



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09/28/24	VH	Attend Zoom call with K. Kent, R. Weiss, M. Shanahan, and T. Gosau [REDACTED]	1.40
09/29/24	KK	Review updated action items list.	0.30
09/29/24	KK	Emails with R. Weiss [REDACTED] [REDACTED]; emails with V. Huber [REDACTED].	0.50
09/29/24	KK	Begin review of defendants' financial disclosures; emails with V. Huber re issues arising from same.	0.80
09/29/24	KK	Correspondences with defendants' counsel.	0.10
09/29/24	KK	Review summary materials from VH [REDACTED] [REDACTED]; emails with VH re follow-up.	0.40
09/29/24	KK	Review and approve notice and preservation letter to prior counsel for Empire; emails with V. Huber re same.	0.10
09/29/24	KK	Emails with V. Huber [REDACTED] [REDACTED]	0.10
09/29/24	MJB	Calls and email with R. Poteet from Gordan Rees regarding preservation and collection of Peter Prusinowski Gmail account per request of K. Kent.	0.80
09/29/24	RW	Continued customer reach-out; Review and edit Wave account to handle incoming payments from customers and email team regarding same.	0.90
09/29/24	RW	Call with V. Huber regarding status report and action items.	0.60
09/29/24	VH	Email correspondence with A. Grier and R. McAuliffe regarding Empire Holdings' EIN number.	0.20
09/29/24	VH	Begin to draft Receiver's Report to the court.	0.80
09/29/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent and R. Weiss regarding same and strategy related thereto.	3.40
09/30/24	JR	Various phone calls with T. Gosau regarding bank accounts.	0.40



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09/30/24	JR	Zoom call with Team regarding fact updates and related action items.	2.00
09/30/24	JR	Continue to update login passwords.	0.80
09/30/24	JR	Review ChatGPT account regarding update of password and emails to/from R. Weiss regarding account status.	0.40
09/30/24	JR	Emails to/from R. Kaplan regarding Account Preservation.	0.50
09/30/24	KK	Further steps to set up bank and payment processing accounts for receivership estate; correspondences with TD Bank and Payoneer in connection with same; further set up of Payoneer account (NO CHARGE .90).	0.00
09/30/24	KK	Phone calls and correspondences with R. Weiss and V. Huber [REDACTED] [REDACTED] [REDACTED]; review initial analysis from A&M [REDACTED]	0.90
09/30/24	KK	Review defendant's declaration (NO CHARGE .10).	0.00
09/30/24	KK	Review M. Mull research [REDACTED]; emails with M. Mull re same (NO CHARGE .20).	0.00
09/30/24	KK	Review and revise draft letter to Court (NO CHARGE .30).	0.00
09/30/24	KK	Emails with M. Shanahan [REDACTED] [REDACTED]	0.20
09/30/24	KK	Correspondences with Charles Schwab and TD Bank re wire transfers; phone call with TD Bank.	0.50
09/30/24	KK	Updates from FTC and R. Weiss [REDACTED] [REDACTED]	0.10
09/30/24	KK	Correspondence from FTC re EIN numbers for receivership entity and related entities.	0.10
09/30/24	KK	Further changes to draft response to motion to amend (NO CHARGE .20).	0.00
09/30/24	KK	Email to Simvolvy re Storefunnels.	0.10



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09/30/24	KK	Call with team re multiple action items and strategy [REDACTED] [REDACTED]	1.70
09/30/24	MJB	Finalize collection and QC of Peter Prusinowski Gmail account per request of K. Kent; coordinate and validate data ingestion for Gmail into ECA database per request of K. Kent.	1.10
09/30/24	MM	Confer with K. Kent, J. Russell, R. Weiss, and V. Huber about strategy for case.	1.80
09/30/24	MM	Review all of Empire's accounts and determine whether information needs to be preserved.	2.10
09/30/24	MM	Research issue [REDACTED]	1.40
09/30/24	MM	Research and draft analysis [REDACTED] [REDACTED]	2.20
09/30/24	RW	Ongoing investigation into business operations of company, including interviews with back-office staff, and development of action items and plan for handling same, and communicate with K. Kent, V. Huber, M. Mull, and J. Russell regarding same.	8.70
09/30/24	RW	Call with P. Hoppenfeld (prior counsel for Empire) and email K. Kent, V. Huber, and M. Mull regarding same.	0.20
09/30/24	RW	Communicate with accountant for Empire and email Alvarez and Marsal team, K. Kent, J. Russell and V. Huber regarding setting up meeting for same.	0.20
09/30/24	RW	Go to post office and meet P. Prusinowski there for key exchange and pick up mail.	1.30
09/30/24	VH	Attend Zoom call with M. Shanahan, T. Gosau, and A. Smith regarding overview of accounting and records for Empire Holdings.	1.40
09/30/24	VH	Telephone calls with Empire customers regarding overview of receivership and experience with Ecommerce product purchase and expectations.	1.70



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09/30/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	5.60
09/30/24	VH	Review and revise Receiver's letter to the court regarding updates and intended actions regarding Receivership duties and send updated draft to K. Kent and R. Weiss for review.	0.40
10/01/24	JR	Review WSFS account regarding transfer from TD Bank.	0.20
10/01/24	JR	participate in team meeting regarding action items.	1.20
10/01/24	JR	Various calls with V. Huber regarding WSFS account and payoneer account and link WSFS account and Payoneer account for payments to back-office staff.	0.40
10/01/24	JR	Emails to/from A. Hussain regarding accounts.	0.20
10/01/24	JR	Review logins and email to R. Kaplan priority logins.	0.30
10/01/24	KK	Emails with J. Russell and WSFS re incoming funds and account set up for same (NO CHARGE .20).	0.00
10/01/24	KK	Review SOW from IG360 and approve same (.2 no charge); emails with R. Weiss re related data collection efforts and discussing same with FTC; follow-up correspondences with defendants' counsel, M. Boland, R. Weiss and V. Huber re search terms.	0.40
10/01/24	KK	Zoom meeting with team re action items [REDACTED] [REDACTED]	1.70
10/01/24	KK	Phone calls to and with TD Bank; correspondences with same; complete paperwork for same (NO CHARGE .60).	0.00
10/01/24	KK	Phone call with R. Weiss [REDACTED] [REDACTED]	0.40
10/01/24	KK	Review and revise draft correspondence to court (NO CHARGE .10).	0.00
10/01/24	KK	Conference call with FTC attorneys and R. Weiss re fact developments and procedural developments.	1.00



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10/01/24	KK	Multiple correspondences with FTC and team re fact issues re website accounts.	0.50
10/01/24	KK	Correspondences with A&M and R. Weiss [REDACTED] [REDACTED]	0.50
10/01/24	KK	Correspondences with FTC, R. Weiss, V. Huber re search terms.	0.20
10/01/24	KK	Phone calls with FTC re potential stipulation and fact issues; discuss [REDACTED] with R. Weiss.	0.40
10/01/24	KK	Phone calls with V. Huber re accounts; review correspondence from contractors' counsel re demand for information and emails with V. Huber re follow-up.	0.40
10/01/24	KK	Review correspondences with Schwab re wire transfers; correspondence from TD Bank re same (NO CHARGE .40).	0.00
10/01/24	KK	Phone call with Defendants' counsel; follow-up calls with FTC's counsel and R. Weiss re fact issues and proposed stipulation; phone call to defendants' counsel re position on stipulation.	1.00
10/01/24	KK	Phone calls and correspondences with V. Huber [REDACTED] [REDACTED]; review correspondence to Defendants' counsel re same; review defendants' proposal re operational issues; phone call with R. Weiss re same.	0.70
10/01/24	MJB	Coordinate and validate data ingestion for Gmail into ECA database per request of K. Kent.	0.60
10/01/24	MM	Investigate social media accounts and draft analysis [REDACTED] [REDACTED]	2.80
10/01/24	MM	Review case strategy [REDACTED].	1.60
10/01/24	MM	Correspondence with R. Weiss, K. Kent, and V. Huber about strategy [REDACTED] [REDACTED]	0.40
10/01/24	RW	Begin to prepare Receiver's report in connection with upcoming preliminary injunction hearing.	2.00
10/01/24	RW	Continued communications with back-office staff.	0.30



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10/01/24	RW	Attend strategy meeting with K. Kent, V. Huber, M. Mull, and J. Russell.	1.80
10/01/24	RW	Continued investigation and management of business operations and related issues; Prepare list of proposed search terms for culling of data from P. Prusinowski's personal Gmail account; Prepare letter to defense counsel regarding additional Receivership Entities; Communicate with K. Kent, V. Huber, J. Russell and/or M. Mull regarding same.	3.60
10/01/24	RW	Call with K. Kent, A. Grier, and R. McAuliffe regarding current status of investigation and progress.	1.20
10/01/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	5.50
10/01/24	VH	Review and revise list of proposed search terms for culling relevant data from P. Prusinowski Google account and send updated list to R. Weiss.	0.20
10/01/24	VH	Draft and send letter to D. Lodmell regarding notice of receivership and preservation obligations.	0.40
10/01/24	VH	Review and revise letter to defense counsel regarding additional receivership entities and send updated draft to K. Kent and R. Weiss.	0.60
10/01/24	VH	Continue drafting Receiver's report to the court.	1.60
10/02/24	CC	Preserve data from both Clickfunnels and Storefunnels. Additionally, post a notice on every page of the EEB website and manually input expired accounts to excel spreadsheet.	7.00
10/02/24	JR	Zoom call with A. Hussain regarding account logins.	0.30
10/02/24	JR	Zoom meeting with K. Kent, V. Huber and M. Mull regarding action items.	0.90
10/02/24	JR	Create and setup PayPal account for receivership payments to back-office staff.	0.80
10/02/24	JR	Email to R. Weiss and V. Huber regarding call with A. Hussain regarding logins.	0.20
10/02/24	JR	Phone call with R. Kaplan and FedEx regarding Laptop	0.50



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10/02/24	JR	Meet with V. Huber; Review WSFS Bank Account and Payoneer Account and issue payments.	2.80
10/02/24	JR	Review and update youtube/google account login	0.30
10/02/24	JR	Review veem login and email to V. Huber regarding login; and email to P. Prusinowski regarding veem account.	0.40
10/02/24	KK	Meeting with legal team [REDACTED]; review revised correspondence to defendants' counsel re same; extension of meeting with A&M [REDACTED]; correspondences with team [REDACTED]	1.40
10/02/24	KK	Phone calls and correspondences with FTC re potential stipulation and fact issues; discuss [REDACTED] with R. Weiss.	0.70
10/02/24	KK	Correspondences with WSFS re account and expected wires into it; correspondences with TD Bank.	0.70
10/02/24	KK	Review memo from M. Mull [REDACTED]; correspondences with V. Huber and M. Null re same.	0.30
10/02/24	KK	Email from FTC re stipulation reached with defendants' counsel.	0.10
10/02/24	KK	Phone call with Defendants' counsel; follow-up calls with FTC's counsel and R. Weiss re fact issues and proposed stipulation; phone call to defendants' counsel re position on stipulation.	1.40
10/02/24	KK	Review Fidelity responses to TRO demand.	0.20
10/02/24	KK	Multiple correspondences with TD Bank re wire transfers; execute documents re same.	0.30
10/02/24	KK	Phone calls and correspondences with V. Huber re payment issues; review correspondence to Defendants' counsel re same.	0.30
10/02/24	MJB	Coordinate and provide estimates for collection of social media accounts per request of K. Kent.	0.40
10/02/24	MM	Correspondence with K. Kent and V. Huber [REDACTED]	0.80



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10/02/24	MM	Correspondence with V. Huber [REDACTED] [REDACTED]	0.30
10/02/24	MM	Correspondence with V. Huber and Empire employee regarding Facebook management.	0.50
10/02/24	MM	Correspondence with legal director of ActiveCampaign regarding administrative control of account.	0.10
10/02/24	RW	Review response from Fidelity to TRO Order.	0.10
10/02/24	RW	Continued investigation, analysis, and handling of business operations, assets, and related issues and communicate with K. Kent, V. Huber, M. Mull, J. Russell, M. Shanahan and T. Goseau regarding same.	3.60
10/02/24	VH	Attend Zoom call with K. Kent, M. Shanahan, and T. Gosau [REDACTED] [REDACTED]	0.40
10/02/24	VH	Attend Zoom call with M. Mull, C. Fleming, and J. Zeller regarding access to Empire Facebook pages.	0.50
10/02/24	VH	Attend Teams call with T. Gosau [REDACTED] [REDACTED]	0.50
10/02/24	VH	Telephone call with R. Poteet regarding payments to Empire back office employees and send email memorializing same.	0.50
10/02/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	7.30
10/03/24	CC	Preserve data from Slack, Jotform, Pipedrive, Simple Invoice, Monday and DocuSign platforms.	7.00
10/03/24	JR	Emails to/from R. Weiss, et al. regarding Laptop Update and email to P. Prusinowski regarding laptop	0.50
10/03/24	JR	Zoom call with K. Kent regarding Payoneer account.	0.50
10/03/24	JR	Continue setup of paypal account, phone call to WSFS Bank regarding account deposit and email to V. Huber, R. Weiss, and K. Kent regarding account setup issues.	1.70



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10/03/24	JR	Generate and submit wire payments through WSFS account.	1.40
10/03/24	JR	Review and update WSFS Bank account regarding account administration.	0.80
10/03/24	JR	Review WSFS training videos regarding wire transfers (NO CHARGE .30).	0.00
10/03/24	JR	Phone call with V. Huber regarding WSFS account wires and payments	0.10
10/03/24	JR	Phone call with A. Mehta regarding A&M and Charles Schwab Bank regarding account access.	0.30
10/03/24	KK	Review motion to continue; conference call with defendants' counsel and R. Weiss; conference call with FTC's counsel and defendants' counsel; phone call to Court with same; related correspondences and conference calls re agreement to extend TRO, postpone PI hearing; review notices from court; phone call with R. Weiss re key action items.	1.20
10/03/24	KK	Address issues [REDACTED]; emails with R. Weiss and V. Huber [REDACTED]	0.90
10/03/24	KK	Emails with FTC and defendants' counsel re return of \$77,000 payment.	0.20
10/03/24	KK	Multiple phone calls and correspondences with WSFS, V. Huber and J. Russell re payment issues; conference call with K. Koenig at WSFS re wire payments for contractors; review emails with contractors and V. Huber; emails with V. Huber re Simvolvy; emails with R. Weiss and A. Husein re operational issues; correspondences with Simvolvy re payment; review information re Amex charges and correspondences with team [REDACTED]; phone call with R. Weiss and V. Huber [REDACTED]	3.50
10/03/24	KK	Review order extending TRO; correspondences with R. Weiss re same (NO CHARGE .30).	0.00
10/03/24	KK	Address Payoneer set up and confirmation issues; phone calls with J. Russell re same.	0.40
10/03/24	KK	Emails with V. Huber [REDACTED] (NO CHARGE .20).	0.00
10/03/24	KK	Review order denying motion to amend (NO CHARGE .10).	0.00



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10/03/24	MJB	Analyze, edit, and format search terms and provide reports for ESI collection/document culling purposes per request of per request of K. Kent.	0.80
10/03/24	RW	Calls with V. Huber and K. Kent [REDACTED]	1.10
10/03/24	RW	Review filings regarding motion to amend TRO.	0.40
10/03/24	RW	Continued analysis and handling of business operation matters, back-office staff, assets, and other issues relating to receivership and TRO Order and communicate with K. Kent, V. Huber and FTC regarding same.	1.90
10/03/24	VH	Telephone call with R. Poteet regarding payments to Empire back office employees.	0.10
10/03/24	VH	Prepare and facilitate wire transfer payments to Empire back office employees with J. Russell.	1.70
10/03/24	VH	Email correspondence with Empire back office staff regarding information needed in order to initiate wire transfer payments.	1.10
10/03/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	6.40
10/04/24	JR	Zoom call with V. Huber and R. Weiss regarding WSFS wire transfers.	1.60
10/04/24	JR	Zoom call with V. Huber and R. Weiss regarding wire payments and review accounts submit wire payments.	2.50
10/04/24	JR	Review and update password spreadsheet.	0.50
10/04/24	JR	analyze and save materials from FTC.	0.90
10/04/24	KK	Multiple correspondences with WSFS, J. Russell and V. Huber re wire transfers for contractors.	0.50
10/04/24	KK	Phone calls and correspondences with defendants' counsel, FTC's counsel and R. Weiss re hearing date, additional financial information and related issues.	0.50
10/04/24	KK	Review order re hearing (NO CHARGE .10).	0.00



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10/04/24	KK	Correspondences with V. Huber and M. Boland re data preservation and collection, including search terms.	0.20
10/04/24	KK	Conference call and correspondences with R. Weiss and V. Huber re next steps [REDACTED]	2.50
10/04/24	KK	Multiple correspondences from contractors demanding payment, with A. Hussain and R. Weiss re same and arranging payments, reductions.	0.50
10/04/24	KK	Multiple correspondences with TD bank re wire transfers.	0.20
10/04/24	MJB	Coordinate and provide estimates for collection of social media accounts per request of K. Kent.	0.30
10/04/24	MM	Draft Notices of TRO Extension and correspond with relevant entities.	2.40
10/04/24	RW	Continued analysis and handling of business operation matters and [REDACTED], and communications with K. Kent, V. Huber and J. Russell regarding same; Meet with V. Huber, M. Shanahan and T. Gosau [REDACTED]	5.60
10/04/24	RW	Review and analyze [REDACTED] email Alvarez and Marsal team [REDACTED]	0.30
10/04/24	VH	Confer with R. Weiss [REDACTED]	0.30
10/04/24	VH	Attend Zoom call with R. Weiss, M. Shanahan, and T. Gosau regarding [REDACTED]	1.40
10/04/24	VH	Review and revise template notice letter regarding TRO extension and send updated draft to M. Mull.	0.60
10/04/24	VH	Prepare and facilitate wire transfer payments to Empire back office staff with J. Russell.	3.60



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10/04/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	3.10
10/05/24	KK	Emails with TD Bank re extended receivership order and wire transfers.	0.10
10/05/24	KK	Emails with V. Huber and R. Weiss re action items for coming week, pleadings, and entries of appearances.	0.50
10/05/24	KK	Correspondences from A. Hussain and P. Prusinowski re fact issues and operational issues.	0.20
10/05/24	KK	Email to defendants' counsel and FTC re hearing.	0.10
10/06/24	KK	Review information from P. Prusinowski re claimed explanations for Amex charges post 9/20; email to R. Weiss re same.	0.20
10/07/24	JR	Meeting with R. Weiss, K. Kent, M. Mull, and V. Huber action items.	1.00
10/07/24	JR	Phone call with A. Mehta regarding account access.	0.20
10/07/24	JR	Review WSFS Bank account regarding incoming wires.	0.10
10/07/24	JR	Email to M. Mull regarding preservation update.	0.20
10/07/24	JR	Zoom call with V. Huber regarding Wire payments from WSFS account.	1.00
10/07/24	JR	Begin to review and assemble list of account regarding preservation and password changes.	0.40
10/07/24	JR	Emails to/from A. Maldonado from WSFS Bank regarding wire transfers.	0.40
10/07/24	KK	Meeting with R. Weiss, V. Huber, J. Russell and M. Mull (later two partial) re action items [REDACTED]	2.40
10/07/24	KK	Review emails from defendants' COO re contractors; review fact information compiled re same; review [REDACTED]; emails with R. Weiss and V. Huber re same.	1.00



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10/07/24	KK	Complete mail forwarding materials for USPS per extended order	0.50
10/07/24	KK	Emails with FTC re developments.	0.10
10/07/24	MM	Conference with K. Kent, R. Weiss, V. Huber, and J. Russell [REDACTED] [REDACTED]	1.60
10/07/24	MM	Draft notices and correspond with entities regarding amended TRO.	1.80
10/07/24	RW	Continued investigation, analysis and handling of business operations and assets; Communications with K. Kent, V. Huber, M. Mull, and J. Russell and other parties regarding same.	4.40
10/07/24	VH	Prepare, facilitate, and manage wire transfer payments to Empire back office contractors with J. Russell.	1.10
10/07/24	VH	Email correspondence with Empire back office contractors regarding wire transfer payments made to them.	0.50
10/07/24	VH	Draft email to A. Gulshan regarding overview of payments to Empire back office contractors and issues regarding wires related to same and send draft email to K. Kent and R. Weiss for review.	1.50
10/07/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	4.90
10/08/24	JR	Download, save, and send TD Bank statements to K. Kent, R. Weiss, R. McAuliffe, R. Tyndall, and M. Joyner.	2.50
10/08/24	JR	Review WSFS Bank account regarding TD Bank wire.	0.10
10/08/24	JR	Phone call with A. Mehta regarding Gemini Crypto.	0.20
10/08/24	JR	Zoom call with V. Huber regarding wire payments and generate and submit wire payments.	0.80
10/08/24	KK	Review multiple correspondences from COO and approve draft responses to same.	0.40
10/08/24	KK	Email to TD Bank re wires; correspondences from WSFS.	0.30
10/08/24	KK	Meeting with FTC re developments.	1.30



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10/08/24	KK	Review [REDACTED]; emails with M. Mull and R. Weiss re website additions.	0.20
10/08/24	KK	Correspondences with counsel re hearing; call with Court re same; follow-up correspondences with counsel and Court.	0.50
10/08/24	KK	Emails with R. Weiss and M. Mull re new 754 notices for amended order. (NO CHARGE .20).	0.00
10/08/24	KK	Review and approve submission to Court; discuss same with R. Weiss.	0.20
10/08/24	KK	Email to contacts [REDACTED].	0.10
10/08/24	KK	Meeting with R. Weiss and V. Huber [REDACTED]	0.70
10/08/24	KK	Multiple correspondences with R. Weiss [REDACTED]	0.50
10/08/24	KK	Attend to extension of mail forwarding in person at post office, meeting with postal official re same.	0.70
10/08/24	KK	Emails with R. Weiss re [REDACTED]	0.20
10/08/24	KK	Review draft customer questionnaire; emails and phone call with R. Weiss re same and follow-up with FTC.	0.40
10/08/24	RW	Meet with K. Kent and V. Huber [REDACTED]	0.70
10/08/24	RW	Meet with K. Kent, A. Grier and R. McAuliffe to discuss case status and immediate next steps.	1.30
10/08/24	RW	Meeting with accountant and Alvarez and Marsal team [REDACTED]	1.00
10/08/24	RW	Continued investigation, analysis, and handling of ongoing business and operational issues; Communications with K. Kent, V. Huber, M. Mull, J. Russell and defendants regarding same; Prepare consumer questionnaire.	4.20



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10/08/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	1.50
10/08/24	VH	Prepare, facilitate, and manage wire transfer payments to Empire back office contractors with J. Russell.	0.70
10/08/24	VH	Attend Zoom call with K. Kent and R. Weiss regarding strategy [REDACTED]	0.70
10/08/24	VH	Confer with M. Mull regarding filing supplemental 754 notices in federal district courts and coordinating with C. Chew regarding adding notice of receivership to Ecommerce website.	0.20
10/08/24	VH	Confer with R. Weiss [REDACTED]	0.10
10/09/24	CC	Set up Empire Holdings Group Receivership website and upload all relevant documents to the website.	4.00
10/09/24	CC	Basecamp preservation for Ahmed and Kamil's accounts.	2.00
10/09/24	JR	Emails to/from R. Kaplan regarding account preservation.	0.30
10/09/24	JR	Zoom call with V. Huber regarding wire payment submissions.	0.80
10/09/24	JR	Review WSFS bank account regarding account updates and email to V. Huber regarding wire payments.	0.20
10/09/24	JR	Email to C. Chew regarding account preservation.	0.10
10/09/24	JR	Review WSFS account regarding wire transfer and email to R. Weiss regarding wire.	0.20
10/09/24	JR	Review WSFS account and generate transaction ledger regarding WSFS account transactions.	1.60
10/09/24	JR	Continue to review and assemble list regarding account updates and preservation.	1.70
10/09/24	KK	Conference call and correspondences with FTC.	0.50



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10/09/24	KK	Review additional blog regarding EEB and emails with team re action items re same.	0.20
10/09/24	KK	Review outline of issues for discussion with defendants' counsel; conference call with defendants' counsel; follow-up call with R. Weiss re action items from same.	0.60
10/09/24	KK	Meeting with A&M [REDACTED]	0.70
10/09/24	KK	Emails with R. Weiss re receivership website.	0.10
10/09/24	KK	Phone call with R. Weiss [REDACTED]; Conference call with COO; follow-up call with R. Weiss.	1.10
10/09/24	KK	Execute additional forms for TD bank transfers; emails with TD Bank re same (NO CHARGE .50).	0.00
10/09/24	KK	Emails with M. Mull et al [REDACTED]	0.20
10/09/24	KK	Review analysis [REDACTED] and draft letter re same.	0.30
10/09/24	KK	Multiple correspondences and phone calls with R. Weiss [REDACTED]	1.20
10/09/24	MM	Draft Form 754 Notices to Federal Courts regarding TRO Extension.	0.70
10/09/24	MM	Draft Supplemental Letter to Lodmell & Lodmell regarding invoices paid by Empire Holdings Group.	1.80
10/09/24	RW	Meet with COO and K. Kent to discuss ongoing operational issues.	0.70
10/09/24	RW	Continued analysis and handling of various operational, financial, and related issues; [REDACTED]; Communicate with K. Kent, V. Huber, M. Mull, C. Chew and J. Russell regarding the foregoing.	5.20
10/09/24	RW	Meet with K. Kent and A. Grier to discuss consumer survey and other pending operational issues.	0.40



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10/09/24	RW	Meet with K. Kent, M. Shanahan and T. Gosau [REDACTED] [REDACTED]	0.60
10/09/24	VH	Review, identify, and compile Ask the Client Reports in Relativity database and send same to R. Weiss, M. Shanahan, and T. Gosau.	0.50
10/09/24	VH	Prepare, facilitate, and manage wire transfer payments to Empire back office contractors with J. Russell.	0.60
10/10/24	JR	Phone call with A. Mehta regarding Hello Sign login.	0.10
10/10/24	JR	Emails to/from R. Weiss, and K. Koenig regarding wire payments and review account regarding returned wire payment.	0.50
10/10/24	JR	Review WSFS Account and update transaction ledger	0.60
10/10/24	KK	Multiple emails from banks re wire transfers and financial transactions.	0.20
10/10/24	KK	Emails with R. Weiss [REDACTED] [REDACTED]	0.50
10/10/24	KK	Review Court order; Correspondences with WSFS re same.	0.20
10/10/24	KK	Meeting with R. Weiss and M. Mull (partial attendance) [REDACTED] [REDACTED] [REDACTED]	1.30
10/10/24	KK	Emails with FTC and R. Weiss re Amex; review and revise draft correspondence to same.	0.30
10/10/24	KK	Meet with M. Mull [REDACTED] [REDACTED]	0.30
10/10/24	KK	Multiple correspondences with defendants, new defendants' counsel re fact issues and procedural issues; emails with R. Weiss re same; review memo from R. Weiss [REDACTED] [REDACTED]	1.00
10/10/24	MM	Draft Supplemental letter to Lodmell & Lodmell regarding invoices paid by Empire and send correspondence.	0.30



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10/10/24	MM	Conference with K. Kent and R. Weiss [REDACTED] [REDACTED]	0.80
10/10/24	MM	Draft letters to TD Bank and American Express requesting documents and compliance with TRO Order.	1.90
10/10/24	RW	Review and revise follow-up letter to Lodmell and Lodmell, review counsel's website and communicate with team regarding same.	0.30
10/10/24	RW	Continued analysis and handling of various operational, financial and receivership issues; Review of amended 754 notices; Communications with K. Kent, V. Huber, M. Mull and J. Russell regarding the foregoing.	2.00
10/10/24	RW	Call with P. Prusinowski regarding Star Active Sports.	0.20
10/10/24	RW	Meet with K. Kent and M. Mull to discuss status of various action items and analysis, [REDACTED] [REDACTED]	1.30
10/10/24	VH	Review and revise amended 754 notices to federal district courts and send updated draft to R. Weiss for review.	0.20
10/11/24	JR	Phone call with T. Gosau regarding account access.	0.20
10/11/24	JR	Zoom call with V. Huber regarding wire transfer payments.	1.00
10/11/24	JR	Phone call with V. Huber regarding wire transfers.	0.20
10/11/24	JR	Review WSFS account regarding wire payments.	0.20
10/11/24	KK	Multiple correspondences with TD Bank, WSFS.	0.30
10/11/24	KK	Review and approve draft mass email to customers.	0.10
10/11/24	KK	Email from R. Weiss [REDACTED] [REDACTED]; Multiple emails with R. Weiss, V. Huber, C. Ching [REDACTED] [REDACTED]	0.50
10/11/24	KK	Emails with A. Hussain and R. Weiss re operational issues.	0.20
10/11/24	KK	Review updated chart [REDACTED] [REDACTED]	0.10



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10/11/24	MM	Draft 754 Notices Regarding TRO Extension and Further Continuance of Preliminary Injunction Hearing and correspond with District Courts.	0.90
10/11/24	RW	Continued review, analysis, and handling of ongoing operational and receivership matters and action items, [REDACTED]; Communicate with K. Kent, V. Huber, M. Mull and J. Russell regarding the foregoing; Emails with A. Hussain and K. Kent regarding back-office and operational issues.	2.70
10/11/24	VH	Telephone call with current Empire customer regarding nature of receivership and forthcoming customer questionnaire to be available on receivership website.	0.30
10/11/24	VH	Prepare, facilitate, and manage wire transfer payments to Empire back office contractors with J. Russell.	0.90
10/11/24	VH	Email correspondence with Empire back office contractors regarding status of wire transfer	0.40
10/11/24	VH	Email correspondence with K. Walsh regarding compilation of Empire customer emails for forthcoming outreach regarding receivership website and customer questionnaire.	0.20
10/11/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	5.10
10/12/24	KK	Review defendants' motion to use Atlas funds to pay fees; Email from R. Weiss [REDACTED]; emails with R. Weiss and A&M [REDACTED]; review additional materials re Atlas.	0.90
10/12/24	RW	Review and analyze defendant's motion for attorney's fees and email K. Kent and V. Huber regarding same.	0.30
10/12/24	RW	Review and analysis [REDACTED]	0.60
10/13/24	KK	Emails with R. Weiss and A&M [REDACTED]; email from defendant re same.	0.90
10/13/24	KK	Review responses from defendant re Atlas; emails with R. Weiss and A&M re same.	0.20



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10/13/24	KK	Review new online receivership website for Empire.	0.10
10/13/24	KK	Review and revise draft letter making Atlas a receivership entity; emails with R. Weiss re same.	0.30
10/13/24	MM	Draft Receiver Report section regarding basis for decision to temporarily deactivate social media accounts.	1.40
10/13/24	RW	Review available information and documents regarding Atlas, prepare letter naming Atlas as Receivership Entity, and communicate with K. Kent, V. Huber, T. Gosau and M. Shanahan regarding same.	2.20
10/13/24	VH	Review and revise letter to defendants regarding Receiver's designation of Atlas Fund entities as receivership parties and send updated draft to K. Kent, R. Weiss, M. Shanahan, and T. Gosau for review.	0.30
10/13/24	VH	Review email correspondence between K. Kent, R. Weiss, M. Shanahan, and T. Gosau [REDACTED]	0.30
10/13/24	VH	Review and analyze defendant's motion for attorneys fees or for withdrawal as counsel.	0.20
10/14/24	JR	Meeting with K. Walsh regarding consumer questionnaires.	0.40
10/14/24	JR	Review WSFS bank account regarding statements.	0.10
10/14/24	JR	Review WSFS account regarding returned wires.	0.50
10/14/24	JR	Generate box share folder upload link and forward to C. Chew (NO CHARGE .10).	0.00
10/14/24	KK	Emails with R. Weiss and V. Huber re consent directive.	0.10
10/14/24	KK	Emails with M. Mull re social media status.	0.20
10/14/24	KK	Review draft letter re Stripe non-compliance with Order; comments on same (NO CHARGE .20).	0.00
10/14/24	KK	Emails with J. Russell re providing WSFS statements to counsel.	0.10
10/14/24	KK	Emails with R. Weiss re payments for back office staff.	0.10



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10/14/24	KK	Correspondences and zoom meeting with FTC re fact issues.	1.00
10/14/24	KK	Review Amex materials (NO CHARGE .10).	0.00
10/14/24	RW	Review V. Huber revisions to letter naming Atlas as Receivership Party.	0.10
10/14/24	RW	Meet with K. Kent, A. Grier and R. McAuliffe to discuss motion for attorney's fees and plan for Atlas.	0.90
10/14/24	RW	Analyze and handle continued operational, back-office staff, financial, and receivership issues and communicate with K. Kent, V. Huber, M. Mull, J. Russell and C. Chew regarding same; Review letter to Stripe regarding noncompliance.	1.10
10/14/24	VH	Draft letter to Stripe regarding noncompliance with receivership order and send draft letter to R. Weiss for review.	0.70
10/14/24	VH	Revise and finalize letter to Stripe regarding noncompliance with receivership order, draft email to Stripe regarding jurisdiction pursuant to filing of 754 notice, and send same to Stripe.	0.90
10/14/24	VH	Email correspondence with Empire back office contractors regarding wire transfer payments.	0.10
10/14/24	VH	Further draft Receiver's Report to the court.	2.60
10/14/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	2.40
10/15/24	JR	Zoom call with V. Huber regarding submission of wire payments.	1.40
10/15/24	JR	Initiate wire payments regarding vendors.	1.50
10/15/24	JR	Review paypal and waves account regarding funds.	1.10
10/15/24	JR	Review WSFS Bank account regarding wire transactions and account updates and update the transaction ledger.	0.80
10/15/24	KK	Review A&M analysis [REDACTED] [REDACTED]	0.30



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10/15/24	KK	Outline near term action items and email to R. Weiss and V. Huber re same.	0.20
10/15/24	KK	Multiple emails re bank transfers for operations (NO CHARGE .30).	0.00
10/15/24	KK	Review draft consent directive and email to V. Huber re same (NO CHARGE .10).	0.00
10/15/24	KK	Emails from COO and with V. Huber re customer issues and payment questions.	0.20
10/15/24	MM	Draft and Revise Receiver Report regarding deactivation of social media accounts.	1.60
10/15/24	MM	Research issue [REDACTED] [REDACTED]	1.20
10/15/24	RW	Continued review, analysis, and handling of various business, operational, and financial issues and communicate with K. Kent, V. Huber, J. Russell and M. Mull regarding same; Review short term action items; Review and propose revisions to Consent Directive; Review and further investigate [REDACTED]; Review and comment on proposed letter to PayPal regarding balance transfer.	1.10
10/15/24	VH	Prepare, facilitate, and manage wire transfer payments to Empire back office contractors with J. Russell.	1.50
10/15/24	VH	Email correspondence with Empire back office contractors regarding wire transfer payments.	0.50
10/15/24	VH	Draft and revise Receiver's Report to the court.	1.10
10/15/24	VH	Review and revise P. Prusinowski Consent Directive and send updated draft to K. Kent and R. Weiss for review.	0.10
10/15/24	VH	Draft letter to PayPal requesting account balance transfer to Receivership Account and send draft to R. Weiss for review.	0.80
10/15/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	2.50
10/16/24	JR	participate in team meeting regarding action items.	1.50



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10/16/24	JR	Initiate wire payment regarding back office payments.	0.40
10/16/24	JR	Review payoneer regarding account setup.	0.50
10/16/24	JR	Review Amex accounts and download account statements and emails to/from R. Weiss regarding Amex account statements.	2.50
10/16/24	KK	Meeting with R. Weiss, V. Huber and J. Russell (partial attendance) re action items [REDACTED]	1.90
10/16/24	KK	Research [REDACTED]	0.40
10/16/24	KK	Review correspondence from defendants' counsel re alleged lien.	0.10
10/16/24	KK	Emails with TD bank and R. Weiss re closing accounts and Stripe overdraft.	0.10
10/16/24	KK	Emails with FTC and defendants' counsel re defendants' financial disclosures.	0.30
10/16/24	KK	Correspondences with A&M [REDACTED]	0.10
10/16/24	KK	Review draft letter to Charles Schwab and comment on same and research [REDACTED]	0.20
10/16/24	RW	Meet with K. Kent, V. Huber, and J. Russell to discuss action items, Receiver's Report, and handling of various operational issues.	1.90
10/16/24	RW	Communicate with K. Kent, V. Huber, and accountants [REDACTED]	0.10
10/16/24	RW	Review proposed consent directive and communicate with V. Huber regarding same; Email P. Prusinowski regarding same.	0.10
10/16/24	RW	Communicate with V. Huber and K. Kent [REDACTED]	0.10
10/16/24	RW	Review letter from S. Freeland regarding asserted retaining lien.	0.10
10/16/24	RW	Calls with V. Huber and TD Bank and email with team [REDACTED]	0.90



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10/16/24	RW	Continue to prepare Receiver's Report.	1.50
10/16/24	VH	Prepare, facilitate, and manage wire transfer payments to Empire back office contractors with J. Russell.	0.30
10/16/24	VH	Attend Zoom call with K. Kent, R. Weiss, and J. Russell regarding current action items for furtherance of receivership duties under TRO order.	1.90
10/16/24	VH	Revise and finalize letter to PayPal requesting account balance transfer to Receivership Account and send finalized letter to PayPal.	0.30
10/16/24	VH	Review and revise letter to PayPal requesting account balance transfer to Receivership Account and send updated draft to R. Weiss for review.	0.40
10/16/24	VH	Revise and finalize P. Prusinowski Consent Directive and send same to R. Weiss.	0.20
10/16/24	VH	Revise and finalize letter to Charles Schwab requesting Atlas account balance transfer to Receivership Account and send finalized letter to Charles Schwab.	0.20
10/16/24	VH	Prepare updated Tax Form 56 for Empire Holdings Group.	0.10
10/16/24	VH	Draft letter to Charles Schwab requesting Atlas account balance transfer to Receivership Account and send draft letter to K. Kent and R. Weiss for review.	0.70
10/16/24	VH	Email correspondence with Empire back office contractors regarding wire transfer payments.	0.10
10/16/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, and J. Russell regarding same and strategy related thereto.	2.90
10/16/24	VH	Prepare Tax Form 56 for Empire Partner Network and Atlas Fund Limited Partnership.	0.40
10/17/24	JR	Review WSFS account regarding wire transactions and update transaction ledger.	1.10
10/17/24	JR	Emails to/from R. Weiss regarding Schwab account	0.10



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10/17/24	JR	Review venmo account regarding access and email to R. Weiss regarding status.	0.20
10/17/24	JR	Review Empire receivership emails and assemble questionnaires.	1.40
10/17/24	JR	Phone call with V. Huber regarding SWIFT code and review WSFS account regarding wire transaction.	0.40
10/17/24	JR	Emails to/from R. Weiss and R. McAuliffe regarding Amex account statements.	0.40
10/17/24	KK	Emails with TD Bank re account closure and in-person activities required for same.	0.20
10/17/24	KK	Emails with V. Huber and R. Weiss [REDACTED] [REDACTED]	0.20
10/17/24	KK	Meeting with FTC re developments and receiver's report.	1.60
10/17/24	KK	Emails with R. Weiss, M. Shanahan and V. Huber [REDACTED] [REDACTED] Review select materials re same.	0.30
10/17/24	KK	Review B. Franke analysis [REDACTED]; emails with R. Weiss re same; emails with R. Franke re same.	0.40
10/17/24	KK	Email from Schwab re liquidating account.	0.10
10/17/24	RW	Meet with A. Grier, R. McAuliffe, and K. Kent to discuss plan for depositions and ongoing issues with Receivership.	1.60
10/17/24	RW	Continue to prepare Receiver's Report.	8.60
10/17/24	RW	Continue to handle ongoing business, operational, financial, and receivership issues and communicate with V. Huber, J. Russell, M. Mull, C. Chew and K. Kent regarding same; Review analysis [REDACTED] [REDACTED]; Communications with K. Kent and Alvarez and Marsal team [REDACTED]; Communicate with K. Kent and V. Huber [REDACTED]; Review proposed email to Empire's former accountant; Communications with J. Russell [REDACTED]	1.60
10/17/24	RW	Review FTC response to motion to dismiss.	0.20



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10/17/24	VH	Locate Star Active Sports EIN number in Relativity database, finalize all Tax Form 56s for Empire Holdings Group, Empire Partner Network, Atlas Fund, and Star Active Sports, and coordinate with mailroom for mailing of same to the IRS.	1.00
10/17/24	VH	Confer with R. Weiss regarding strategy [REDACTED]	0.60
10/17/24	VH	Draft email to Empire accountant regarding request for documents regarding Star Active Sports, Empire Partner Network, and the Atlas entities and send draft email to K. Kent and R. Weiss for review.	0.30
10/17/24	VH	Finalize and send email to Empire accountant regarding request for documents regarding Star Active Sports, Empire Partner Network, and the Atlas entities.	0.10
10/17/24	VH	Confer with J. Russell [REDACTED]	0.50
10/17/24	VH	Email correspondence with Empire back office contractors regarding wire transfer payments.	0.20
10/17/24	VH	Continue drafting and revising Receiver's Report to the court.	4.60
10/17/24	VH	Email correspondence with WSFS regarding information to correct certain wire transfer issues.	0.10
10/17/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, and J. Russell regarding same and strategy related thereto.	2.30
10/18/24	CC	Social Media preservation. Youtube, TikTok, Instagram, Facebook and X.	7.00
10/18/24	JR	Emails to/from V. Huber, R. Weiss, and M. Mull regarding ActiveCampaign account.	0.40
10/18/24	JR	Continue to review Empire receivership emails and assemble questionnaires	0.80
10/18/24	JR	Review financial account and assemble balance pages and forward to R. Weiss, T. Gosau and M. Shanahan for review.	2.30
10/18/24	JR	Review and update receiver report and forward to M. Mull, V. Huber and R. Weiss.	1.00



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10/18/24	KK	Emails from FTC and new counsel for defendants re depositions and [REDACTED]	0.20
10/18/24	KK	Email from FTC re former EEB contractors / employees interactions with current customers.	0.10
10/18/24	KK	Review notices of deposition, email from FTC re same, and email from R. Weiss re same.	0.20
10/18/24	KK	Review developments re Stripe account (NO CHARGE .10).	0.00
10/18/24	MM	Draft an updated notice letter to American Express regarding noncompliance with TRO Order.	0.50
10/18/24	MM	Strategize with V. Huber and R. Weiss [REDACTED]	0.20
10/18/24	RW	Continue to prepare Receiver's Report.	1.10
10/18/24	RW	Review analysis [REDACTED]	0.40
10/18/24	RW	Review deposition notices and email V. Huber and K. Kent regarding same.	0.10
10/18/24	RW	Call with V. Huber regarding Receiver's Report.	0.30
10/18/24	RW	Meet with M. Shanahan and T. Gosau [REDACTED]	1.00
10/18/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	0.60
10/18/24	VH	Confer with R. Weiss regarding strategy [REDACTED] (NO CHARGE .40).	0.00
10/18/24	VH	Review A&M's draft accounting analysis for the receivership entities.	0.70
10/18/24	VH	Confer with J. Russell regarding revisions to Receiver's Report to the court (NO CHARGE .10).	0.00



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10/18/24	VH	Continue drafting and revising Receiver's Report to the court.	7.50
10/18/24	VH	Draft and file entry of appearance as Receiver's counsel (NO CHARGE .20).	0.00
10/19/24	KK	Email to J. Russell re WSFS statements.	0.10
10/19/24	KK	Review Empire Tax engagement materials and email amendments to same adding financial planning to scope. Emails with R. Weiss [REDACTED] [REDACTED]	0.50
10/19/24	KK	Emails with A&M and R. Weiss re [REDACTED] receiver's report.	0.10
10/20/24	KK	Emails with R. Weiss re update on Schwab transfer, Gemini account and account balances for receiver's report.	0.10
10/20/24	KK	Preliminary review of Atlas Fund Ltd Partnership tax return for 2023.	0.20
10/20/24	RW	Review online account balance information and analyze [REDACTED] [REDACTED]	0.20
10/20/24	RW	Review and further revise Receiver's report.	1.00
10/20/24	VH	Continue drafting and revising Receiver's Report to the court and send draft to K. Kent, M. Shanahan, and T. Gosau for review.	2.50
10/21/24	CC	Convert consumer questionnaire and upload it to the receivership website.	0.30
10/21/24	JR	Review WSFS account regarding incoming wires.	0.40
10/21/24	JR	Review receivership inbox regarding submitted questionnaires.	0.40
10/21/24	JR	Zoom meeting with R. Weiss and V. Huber regarding Receivership inbox (NO CHARGE .90).	0.00
10/21/24	JR	Review box folder regarding questionnaires.	0.80
10/21/24	JR	Review TD Bank account regarding account information and forward to M. Mull.	0.20
10/21/24	JR	Emails to/from V. Huber regarding Schwab account	0.10



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10/21/24	JR	Review Amex account regarding statements	0.10
10/21/24	JR	Emails to/from V. Huber regarding consumer questionnaires.	0.10
10/21/24	JR	Review emails regarding receivership inbox and response.	0.90
10/21/24	KK	Review draft receiver's report. Emails with R. Weiss and V. Huber re same.	2.80
10/21/24	KK	Emails with defendants' new counsel, FTC and R. Weiss re depositions of defendant, COO and K. Prusinowski (NO CHARGE .20).	0.00
10/21/24	KK	Emails with TD Bank's Office of General Counsel and R. Weiss re transfers/ closures of accounts.	0.20
10/21/24	KK	Review draft letter to Schwab and receivership Order in connection with same. Phone call and email with V. Huber re same. Review revised letter and approve same (NO CHARGE .50).	0.00
10/21/24	KK	Review research [REDACTED]	0.10
10/21/24	KK	Review report from Schwab; E-mails with V. Huber re same.	0.20
10/21/24	KK	Meeting with R. Weiss and V. Huber [REDACTED]	1.00
10/21/24	MM	Analyze Empire Holdings Groups social media (TikTok and Twitter) [REDACTED]	0.30
10/21/24	MM	Analyze Empire Holdings Group's social media (YouTube) [REDACTED]	2.10
10/21/24	MM	Draft Receiver report sections regarding the Receiver's preservation efforts and deactivation of social media.	2.10
10/21/24	MM	Correspondence with V. Huber and analysis [REDACTED] (NO CHARGE .10).	0.00
10/21/24	MM	Research and analyze [REDACTED]	2.50



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10/21/24	RW	Meet with T. Gosau [REDACTED] [REDACTED]	0.40
10/21/24	RW	Meet with K. Kent and V. Huber [REDACTED] [REDACTED]	1.10
10/21/24	RW	Emails with FTC, V. Huber, and K. Kent regarding deposition scheduling (NO CHARGE .10).	0.00
10/21/24	RW	Meet with V. Huber and J. Russell to review consumer email responses [REDACTED]	0.50
10/21/24	RW	Continued review and revision of Receiver's Report; Review and revision of letter to Schwab regarding Atlas account; Continued handling of action and receivership items and communicate with V. Huber and K. Kent regarding same.	1.00
10/21/24	VH	Attend Zoom call with K. Kent and R. Weiss regarding revisions to Receiver's Report to the court and strategy for outstanding action items.	1.30
10/21/24	VH	Attend Teams call with T. Gosau [REDACTED] [REDACTED]	0.30
10/21/24	VH	Attend Zoom call with R. Weiss and J. Russell [REDACTED] [REDACTED]	0.90
10/21/24	VH	Draft letter to Charles Schwab regarding Atlas Fund funds retained by Schwab and request for documentation regarding the margin loan and send draft letter to K. Kent and R. Weiss for review.	0.70
10/21/24	VH	Draft introduction section for Receiver's Report to the court and send updated draft to R. Weiss for review and further revisions.	0.60
10/21/24	VH	Review [REDACTED] [REDACTED]	0.60
10/21/24	VH	Confer with R. Weiss regarding revisions to letter to Charles Schwab regarding Atlas Fund fund retained by Schwab and request for documentation regarding the margin loan.	0.30
10/21/24	VH	Confer with K. Kent regarding revisions to letter to Charles Schwab regarding Atlas Fund fund retained by Schwab and request for documentation regarding the margin loan.	0.30



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10/21/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	2.50
10/21/24	VH	Review K. Kent revisions and comments on draft Receiver's Report to the court and incorporate revisions into draft report.	2.30
10/21/24	VH	Confer with R. Weiss regarding strategy [REDACTED] [REDACTED]	0.30
10/22/24	JR	Begin review of customer questionnaires and update spreadsheet.	4.80
10/22/24	JR	Review WSFS account regarding Wire transfer payment.	0.40
10/22/24	JR	Review WSFS account regarding payment to goDaddy and Simvolvy payment and review of GoDaddy account for payment and submit payment	1.00
10/22/24	JR	Review receivership inbox regarding new questionnaires.	0.20
10/22/24	KK	Review R. Weiss notes [REDACTED] [REDACTED] Emails with R. Weiss re same.	0.70
10/22/24	KK	Emails with COO, R. Weiss, V. Huber, and J. Russell re multiple operational issues re websites, domains, contractor payments and receivership accounts.	0.60
10/22/24	KK	Review bank statements.	0.10
10/22/24	KK	Emails with R. Weiss [REDACTED].	0.20
10/22/24	KK	Review revised and updated receiver's report. Further comments/changes to same. Emails and phone calls with R. Weiss and V. Huber re same (NO CHARGE 2.10).	0.00
10/22/24	KK	Emails with TD Bank.	0.10
10/22/24	MM	Draft Notice letters to entities regarding TRO Order and Asset Freeze	0.80
10/22/24	RW	Review and revise Receiver's Report and communicate with K. Kent and V. Huber regarding same.	4.10



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10/22/24	RW	Begin to review and analyze consumer questionnaires for incorporation into Receiver's Report.	0.60
10/22/24	RW	Continued review, handling of analysis of ongoing business, operational, and receivership issues and communicate with V. Huber, J. Russell, K. Kent, and M. Mull regarding same.	3.00
10/22/24	RW	Meet with V. Huber and T. Gosau [REDACTED] [REDACTED]	0.40
10/22/24	RW	Review history of communications with American Express and email M. Mull regarding same.	0.20
10/22/24	RW	Review K. Kent revisions and comments to Receivership Report and address same.	0.20
10/22/24	VH	Attend Teams call with R. Weiss and T. Gosau regarding [REDACTED] [REDACTED]	0.40
10/22/24	VH	Email correspondence with Empire customer regarding refund request.	0.10
10/22/24	VH	Revise and finalize letter to Charles Schwab regarding Atlas Fund fund retained by Schwab and request for documentation regarding the margin loan and send letter to Charles Schwab.	0.30
10/22/24	VH	Review and revise Receiver's Report to the court, prepare exhibits for same, and send updated draft report with exhibits to K. Kent and R. Weiss for review.	4.00
10/22/24	VH	Revise and finalize Receiver's Report to the court and send report with exhibits to R. Weiss for filing.	0.70
10/22/24	VH	Draft letter to Closer Secrets LLC and R. Grizzle regarding notice of Receivership and document request.	0.30
10/22/24	VH	Email correspondence with Empire back office contractors regarding wire transfer payments.	0.20
10/22/24	VH	Confer with R. Weiss regarding revisions to Receiver's Report to the court.	0.30
10/22/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	2.90



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10/23/24	JR	Email to A. Maldonado regarding wire payments.	0.20
10/23/24	JR	Emails to/from M. Mull regarding Empire Holdings Group Email Addresses.	0.10
10/23/24	JR	Review WSFS account regarding payment.	0.10
10/23/24	JR	Review receivership inbox.	0.30
10/23/24	KK	Phone call and correspondences with R. Weiss [REDACTED] [REDACTED]	0.40
10/23/24	KK	Additional comments to updated draft response to motion for attorneys' fees.	0.40
10/23/24	KK	Attend to bank account closure and transfer matters in meetings at TD Bank Center City Branch. Complete forms related to same. Emails with TD Bank personnel re same (NO CHARGE 3.30).	0.00
10/23/24	KK	Review additional set of mail forwarding forms for Atlas and Empire Partners. Meeting with K. Walsh re same. Emails with R. Weiss re same.	0.70
10/23/24	KK	Review and approve correspondences to AMEX and other financial institutions re compliance with Order.	0.20
10/23/24	KK	Review materials from Schwab and correspondences with R. Weiss [REDACTED] [REDACTED]	0.20
10/23/24	KK	Review and revise draft correspondence to defendants' counsel of record (NO CHARGE .10).	0.00
10/23/24	MM	Draft Notices to additional entities regarding TRO Order and Asset Freeze	0.70
10/23/24	MM	Prepare spreadsheet with Defendants' information and correspond with Payoneer regarding identification of Defendants' accounts with same.	0.30
10/23/24	RW	Prepare response to motion for attorney's fees; Communications with K. Kent, V. Huber, and FTC regarding same.	3.40
10/23/24	RW	Review additional consumer questionnaires.	0.10
10/23/24	RW	Review agreement from Schwab regarding margin loan on Atlas account and e-mail K. Kent and V. Huber [REDACTED]	0.10



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10/23/24	RW	Review proposed letter to Closer Secrets and email V. Huber suggestions regarding same.	0.10
10/23/24	RW	Review and provide feedback regarding proposed follow-up letters to American Express and Stripe; Continued review, analysis, and handling of ongoing operational issues involving business and receivership and communicate with K. Kent and V. Huber regarding same.	1.30
10/23/24	VH	Review Atlas margin agreement provided by Charles Schwab in response to letter request.	0.20
10/23/24	VH	Finish drafting letter to Closer Secrets LLC and R. Grizzle regarding notice of Receivership and document request and send draft to R. Weiss and K. Kent for review.	0.60
10/23/24	VH	Confer with R. Weiss regarding revisions to response to defense counsel's motion for fees incurred to date and revisions to notice letter to Closer Secrets LLC.	0.20
10/23/24	VH	Revise and finalize letter to American Express regarding second notice of noncompliance with TRO Order and send letter to American Express.	0.30
10/23/24	VH	Draft letter to American Express regarding second notice of noncompliance with TRO Order and send draft letter to R. Weiss and K. Kent for review.	1.40
10/23/24	VH	Confer with K. Kent regarding strategy [REDACTED] [REDACTED]	0.30
10/23/24	VH	Draft agenda of action items regarding next steps for receivership for forthcoming team meeting.	0.40
10/23/24	VH	Draft letter to Stripe regarding second notice of noncompliance with TRO Order and send draft letter to K. Kent and R. Weiss for review.	1.00
10/23/24	VH	Review and revise letter to Closer Secrets LLC and R. Grizzle regarding notice of Receivership and document request.	0.40
10/23/24	VH	Review letter from Fidelity Investments responding to letter notice of receivership and obligations under TRO Order.	0.10
10/23/24	VH	Review and revise response to defense counsel's motion for fees incurred to date and send updated draft to R. Weiss and K. Kent for review.	1.40



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10/23/24	VH	Review email request for advertising credit from current Empire customer and confer with R. Weiss and K. Kent regarding same.	0.20
10/23/24	VH	Email correspondence with WSFS bankers and Empire back office contractors regarding wire transfer payments.	0.50
10/23/24	VH	Confer with R. Weiss [REDACTED] [REDACTED]	0.50
10/23/24	VH	Draft questions for P. Prusinowski deposition and send same to R. Weiss for review.	2.00
10/24/24	JR	participate in team meeting [REDACTED] [REDACTED]	1.80
10/24/24	JR	Generate and submit wire payments.	0.60
10/24/24	JR	Emails to/from R. Weiss regarding Celsius account access.	0.20
10/24/24	JR	Review WSFS account regarding returned wires.	0.20
10/24/24	KK	Emails with R. Weiss [REDACTED] [REDACTED]	0.10
10/24/24	KK	Review updated action items for near term.	0.20
10/24/24	KK	Meeting with team re action items [REDACTED] [REDACTED] and strategy re same.	1.80
10/24/24	KK	Phone call and correspondences with defendants' counsel. Emails with R. Weiss re notes re same. Emails with defendants' counsel re position on fund in their escrow account.	0.50
10/24/24	KK	Review and adjust mail forwarding materials. Attend to same re updated hearing date at USPS. Emails with M. Mull and R. Weiss [REDACTED] [REDACTED]	2.20
10/24/24	KK	Meeting with FTC re operational/shut down issues and coordination with asset tracing and discovery efforts.	0.60



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10/24/24	KK	Review revised draft response to defendants' motion re escrow and fees. Phone call with R. Weiss [REDACTED]. Conference call with defendants' counsel re their proposed stipulation and receiver's position re same.	0.90
10/24/24	KK	Follow-up calls with R. Weiss [REDACTED]	0.20
10/24/24	MM	Conference with K. Kent, R. Weiss, V. Huber, and J. Russell to analyze strategy [REDACTED]	1.80
10/24/24	MM	Research [REDACTED]	0.90
10/24/24	MM	Correspond with C. Chew regarding preservation of Defendants' podcasts.	0.20
10/24/24	RW	Review and revise outline for P. Prusinowski deposition.	1.10
10/24/24	RW	Emails with P. Prusinowski, defense counsel, K. Kent and TD Bank regarding release of personal allowance funds.	0.10
10/24/24	RW	Meet with K. Kent, V. Huber, M. Mull, and J. Russell to discuss action items and next steps.	1.40
10/24/24	RW	Review and revise subpoena to Lodmell and Lodmell.	0.50
10/24/24	RW	Call with V. Huber regarding PayPal response and [REDACTED]	0.30
10/24/24	RW	Meet with M. Shanahan and T. Gosau [REDACTED]	0.70
10/24/24	RW	Meet with K. Kent, V. Huber, A. Grier and R. McAuliffe and regarding various issues impacting the Receivership Estate.	0.90
10/24/24	RW	Calls with K. Kent, V. Huber and defense counsel regarding response to motion for attorneys fees and revise same.	1.50



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10/24/24	VH	Attend Zoom call with K. Kent, R. Weiss, M. Mull, and J. Russell regarding outstanding action items and strategy [REDACTED]	1.80
10/24/24	VH	Revise and finalize letter to Stripe regarding second notice of noncompliance with TRO Order and send same to Stripe.	0.50
10/24/24	VH	Email correspondence with Empire customer regarding consumer questionnaire.	0.10
10/24/24	VH	Draft subpoena to Lodmell & Lodmell regarding request for documents related to Atlas Entities and send draft subpoena to R. Weiss for review.	1.10
10/24/24	VH	Email correspondence with M. Boland and FTC e-discovery team regarding request to add issue tags to Relativity databases for review of preserved documents.	0.30
10/24/24	VH	Revise and finalize subpoena to Lodmell and related documentation and send same to J. Russell for coordination of service with process server.	0.50
10/24/24	VH	Attend Teams call with K. Kent (partial attendance), R. Weiss (partial attendance), A. Grier, and R. McAuliffe regarding strategy [REDACTED]	0.90
10/24/24	VH	Email correspondence with WSFS and with Empire back office contractors regarding wire transfer payments.	0.50
10/24/24	VH	Email correspondence with J. Russell regarding details and instructions for facilitating wire transfer payments to Empire back office contractors.	0.60
10/24/24	VH	Draft questions and prepare exhibits for P. Prusinowski deposition.	3.90
10/24/24	VH	Revise and finalize response to defense counsel's motion for attorneys fees and send same to L. Doyle for filing.	0.50
10/24/24	VH	Continue investigation of defendants' business operations and assets and communicate with K. Kent, R. Weiss, M. Mull, and J. Russell regarding same and strategy related thereto.	1.00
10/25/24	JR	Review proof process server platform regarding service result.	0.20
10/25/24	JR	Review and submit subpoena for service.	0.20



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10/25/24	JR	Phone call with V. Huber regarding subpoena to Lodmell and Lodmell.	0.20
10/25/24	JR	Review receivership inbox and update consumer questionnaire summary.	0.70
10/25/24	KK	Multiple emails with FTC, R. Weiss and V. Huber re false or inaccurate statements by defendant regarding financial disclosures and access, review select information from defense counsel re same.	0.40
10/25/24	KK	Multiple correspondences with V. Huber and COO re operational issues (NO CHARGE .30).	0.00
10/25/24	MM	Draft supplemental letter to TD Bank regarding request for information pertaining to Peter Prusinowski's personal account(s).	0.70
10/25/24	MM	Correspondence with C. Chew regarding preservation of Defendants social media accounts.	0.10
10/25/24	MM	Draft follow-up letter to TD Bank requesting information from P. Prusinowski's personal account(s).	0.50
10/25/24	RW	Call with V. Huber regarding P. Prusinowski's deposition.	0.30
10/25/24	VH	Serve notice of subpoena to Lodmell & Lodmell on all counsel.	0.10
10/25/24	VH	Prepare for P. Prusinowski deposition.	1.20
10/25/24	VH	Mark Receiver's exhibits introduced during P. Prusinowski and send same to court reporter.	0.40
10/25/24	VH	Attend and conduct deposition of P. Prusinowski.	7.00
10/25/24	VH	Confer with J. Russell regarding coordinating service of subpoena with process servers and [REDACTED]	0.20
10/25/24	VH	Confer with R. Weiss regarding overview of P. Prusinowski deposition.	0.30
10/26/24	KK	Emails with V. Huber re fact issues [REDACTED]	0.20
10/26/24	RW	Emails with P. Prusinowski and team regarding mail forwarding and email access issues.	0.10



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10/27/24	KK	Emails with R. Weiss [REDACTED] [REDACTED]	0.10
10/27/24	KK	Emails with R. Weiss and V. Huber [REDACTED] [REDACTED]	0.30
10/27/24	KK	Emails with V. Huber and C. Chew [REDACTED] [REDACTED]. Review updates.	0.30
10/27/24	KK	Emails with R. Weiss and A&M [REDACTED]	0.20
10/27/24	RW	Review and revise proposed letter to TD Bank regarding P. Prusinowski's personal account and email team regarding same.	0.10
10/27/24	RW	Prepare email [REDACTED] and email M. Shanahan, T. Gosau, K. Kent and V. Huber regarding same.	0.20
10/27/24	RW	Review notification regarding freezing of American Express cards.	0.10
10/27/24	VH	Manage Empire business operations and review and respond to email correspondence from K. Kent, R. Weiss, and Empire contractors regarding same.	1.00
10/28/24	JR	Review receivership inbox regarding customer questionnaires.	0.40
10/28/24	JR	Review stripe regarding new account.	0.70
10/28/24	JR	Phone call with braintree regarding account setup	0.20
10/28/24	JR	Review PayPal account regarding checkout option; review WSFS account regarding PayPal; and setup Braintree account for payments. call with V. Huber regarding additional accounts.	2.60
10/28/24	JR	Phone call with V. Huber, meeting with R. Sorn and email to L. Bradley regarding inbox (NO CHARGE .30).	0.00
10/28/24	JR	Review GoDaddy account.	0.20
10/28/24	JR	Review WSFS account and update transaction ledger	0.20
10/28/24	JR	Review email from NMI and email findings to K. Kent, R. Weiss, V. Huber, and M. Mull.	0.20



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10/28/24	KK	Review consent directive from P. Prusinowski and email to team re same (NO CHARGE .10).	0.00
10/28/24	KK	Emails with M. Mull re issues [REDACTED] (NO CHARGE .20).	0.00
10/28/24	KK	Emails with M. Joyner at FTC and V. Huber re consumer refund request.	0.20
10/28/24	KK	Discussions with R. Weiss re action items [REDACTED]	0.30
10/28/24	KK	Emails with J. Russell re check cancellation by customer.	0.10
10/28/24	MM	Correspondence with J. Zeller and C. Fleming regarding deactivation of Empire's Facebook.	0.20
10/28/24	MM	Telephone conference with United States Postal Service regarding mail forwarding issues re Empire Holdings Group et al.	0.60
10/28/24	VH	Revise and finalize letter to Closer Secrets and R. Grizzle regarding notice of receivership and request for documents, serve same on R. Grizzle via email, and coordinate mailing of same with mailroom.	1.10
10/28/24	VH	Confer with M. Mull regarding strategy [REDACTED]	0.20
10/28/24	VH	Review and tag documents in FTC Relativity database.	3.70
10/28/24	VH	Confer with J. Russell [REDACTED]	0.20
10/28/24	VH	Manage Empire business operations and review and respond to email correspondence regarding same.	2.80
10/29/24	JR	Continue to setup Stripe account.	1.50
10/29/24	JR	Generate and submit wire transfer to Simvolvy.	0.30
10/29/24	JR	Zoom call with V. Huber regarding Stripe account.	1.00
10/29/24	JR	Phone call with V. Huber regarding outstanding wire payments.	0.20



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10/29/24	JR	Review receivership inbox regarding questionnaires and update summary chart.	1.00
10/29/24	JR	Review WSFS account regarding Paypal transaction	0.40
10/29/24	KK	Correspondences from TD Bank and with V. Huber re follow-up.	0.20
10/29/24	KK	Meeting with R. Weiss and M. Shanahan re strategy [REDACTED] [REDACTED]	0.50
10/29/24	KK	Discuss [REDACTED] with R. Weiss.	0.20
10/29/24	KK	Review and revise draft notice to customers re planned shut down. Emails with V. Huber re same.	0.40
10/29/24	KK	Emails with V. Huber [REDACTED] (NO CHARGE 6.50).	0.00
10/29/24	KK	Review and comment on draft notice to contractors.	0.10
10/29/24	MM	Draft explanatory captions for all court documents uploaded to the Receiver's website.	2.10
10/29/24	MM	Conference with two former Empire Holdings Group customers regarding their experience with Empire and what agencies that are working with currently.	1.10
10/29/24	RW	Review and revise proposed letters to customers and back-office staff regarding suspension of business operations and communicate with K. Kent and V. Huber regarding same; Communicate with K. Kent and M. Shanahan [REDACTED]	0.50
10/29/24	RW	Call with V. Huber [REDACTED]	0.30
10/29/24	VH	Draft letter to Empire contractors notifying of shut down of business operations and resultant termination and send draft to R. Weiss and K. Kent for review.	0.90
10/29/24	VH	Draft letter to Empire customers notifying of shut down of business operations and send draft to R. Weiss and K. Kent for review.	0.70
10/29/24	VH	Confer with counsel for Stripe regarding information and actions taken in response to Receiver's letter to Stripe regarding second notice of noncompliance with TRO Order.	0.60



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10/29/24	VH	Review and revise letter to Empire contractors notifying of shut down of business operations and resultant termination and send updated draft to R. Weiss and K. Kent for review.	0.40
10/29/24	VH	Review and revise letter to Empire customers notifying of shut down of business operations and send updated draft to R. Weiss and K. Kent for review.	0.50
10/29/24	VH	Confer with R. Weiss regarding overview of call with counsel for Stripe and resultant strategy [REDACTED]	0.30
10/29/24	VH	Coordinate with J. Russell regarding connection of Stripe account to Storefunnels and service of letters notifying of shutdown of business operations to Empire contractors and Empire customers.	1.00
10/29/24	VH	Email correspondence with Empire back office contractors regarding wire transfer payments.	0.10
10/29/24	VH	Confer with K. Kent regarding overview of call with counsel for Stripe and resultant strategy [REDACTED]	0.20
10/29/24	VH	Manage Empire business operations and review and respond to email correspondence regarding same.	2.40
10/30/24	CC	Podcast preservation at Speaker.com.	1.00
10/30/24	CC	X preservation - Peter Pru - Ecommerce Empire Builders (@OffPeterPru) X.	0.10
10/30/24	CC	TikTok preservation (TikTok - Ecommerce Empire Builders (@ecommerce.builders)).	0.30
10/30/24	CC	Uploading court documents to the Empire Holding Group Receivership website.	0.20
10/30/24	JR	Meeting with V. Huber regarding stripe and storefunnel accounts.	0.70
10/30/24	JR	Draft, finalize and send email to customers regarding notice of shutdown.	0.20
10/30/24	JR	Review Stripe and Storefunnels regarding payments.	0.40



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10/30/24	JR	Review receivership inbox regarding questionnaires and update summary chart.	0.60
10/30/24	JR	Generate wire transfer payment and emails to/from V. Huber regarding wire payment.	0.70
10/30/24	KK	Review and comment on draft email to defense counsel re taxes.	0.20
10/30/24	KK	Review defendants' reply in support of motion for fees or to withdraw.	0.40
10/30/24	KK	Review Lodmell response to subpoena (NO CHARGE .10).	0.00
10/30/24	KK	Phone calls and correspondences with V. Huber [REDACTED] [REDACTED]. Review email summarizing conversation with Stripe's counsel.	0.50
10/30/24	KK	Multiple correspondences from customers and internal emails with V. Huber and M. Mull re process for same. Initial responses to certain customers.	1.00
10/30/24	KK	Email from TD Bank re account closures.	0.10
10/30/24	MM	Correspondence with former Empire Holdings Group customer regarding her experience with Empire.	0.10
10/30/24	MM	Draft notes [REDACTED] [REDACTED]	0.70
10/30/24	MM	Zoom conference with J. Zeller and C. Fleming to deactivate Facebook.	0.20
10/30/24	MM	Correspondence with former Empire Holdings Group employee regarding their experience.	0.10
10/30/24	VH	Confer with counsel for Stripe regarding intent to relink Storefunnels Stripe account to Storefunnels to collect customer subscription payments and confirmation of Stripe account continued existence.	0.30
10/30/24	VH	Email correspondence with Empire customer regarding refund inquiries.	0.20
10/30/24	VH	Confer with M. Mull regarding strategy [REDACTED] [REDACTED]	0.30



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10/30/24	VH	Draft letter to Lodmell regarding Lodmell's objections to subpoena document requests and send draft letter to K. Kent and R. Weiss for review.	1.30
10/30/24	VH	Review Lodmell response to subpoena and email R. Weiss and K. Kent regarding same.	0.20
10/30/24	VH	Email correspondence with Empire back office contractors regarding wire transfer payments.	0.60
10/30/24	VH	Download, review, and begin annotating P. Prusinowski deposition transcript.	0.30
10/30/24	VH	Manage Empire business operations and communicate with K. Kent, R. Weiss, M. Mull, J. Russell, and C. Chew regarding same.	6.50
10/31/24	JR	Review receivership inbox regarding customer emails.	1.20
10/31/24	JR	Phone call with V. Huber and meeting regarding Kixie account.	0.40
10/31/24	JR	Review inbox regarding questionnaires and update questionnaire summary; and update box shared folder.	1.50
10/31/24	JR	Initiate Wire Transfer payment and emails to/from V. Huber regarding wire payment.	0.40
10/31/24	JR	Review WSFS account regarding approval of wire payment.	0.20
10/31/24	JR	Review AMEX account and re-freeze accounts.	0.40
10/31/24	KK	Correspondences with V. Huber [REDACTED]	0.30
10/31/24	KK	Emails with Simvoly and V. Huber.	0.10
10/31/24	KK	Correspondences with claimants and with M. Mull and V. Huber re follow-up.	0.50
10/31/24	KK	Review and approve revised email to accountant.	0.10
10/31/24	KK	Review and comment on letter to Lodmell. Phone call and correspondences with V. Huber [REDACTED]	0.90



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10/31/24	MM	Correspondence and telephone conference with former Empire customers regarding shutdown of business.	2.20
10/31/24	RW	Call with V. Huber [REDACTED] [REDACTED]	1.00
10/31/24	RW	Review contractor request for separation pay, conduct research [REDACTED] [REDACTED], and respond to same.	0.30
10/31/24	RW	Call with V. Huber [REDACTED] [REDACTED]	0.60
10/31/24	RW	Various email correspondence with defense counsel, Angela at Empire Tax, K. Kent, V. Huber, M. Shanahan and T. Gosau regarding tax returns and Quickbooks access.	0.80
10/31/24	RW	Review emails from V. Huber [REDACTED] [REDACTED]	0.20
10/31/24	RW	Review and revise letter to Lodmell and Lodmell regarding subpoena response and communicate with K. Kent and V. Huber regarding same.	0.20
10/31/24	RW	Review and respond to email communications from customers and back-office staff, and communicate with K. Kent, V. Huber, and M. Mull regarding same.	0.60
10/31/24	RW	Review defendants' reply in support of motion for attorney's fees and email K Kent and V. Huber regarding same.	0.30
10/31/24	VH	Telephone call with Empire customer regarding intended shutdown of Empire business operations and refund inquiry.	0.20
10/31/24	VH	Confer with R. Weiss [REDACTED] [REDACTED]	0.70
10/31/24	VH	Confer with K. Kent [REDACTED] [REDACTED], and general action item updates.	0.50
10/31/24	VH	Email correspondence with Empire back office contractors regarding wire transfer payments.	0.20



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10/31/24	VH	Facilitate final wire transfer payments to Empire back office contractors with J. Russell.	0.20
10/31/24	VH	Continue reviewing and annotating P. Prusinowski deposition transcript.	3.10
10/31/24	VH	Review and revise letter to Lodmell regarding Lodmell's objections to subpoena document requests and send updated draft to K. Kent and R. Weiss for review.	0.70
10/31/24	VH	Revise and finalize letter to Lodmell responding to objections to subpoena document requests and send same to counsel for Lodmell.	0.40
10/31/24	VH	Manage Empire business operations and communicate with K. Kent, R. Weiss, M. Mull, J. Russell, and C. Chew regarding same.	2.60

**Total 848.50**

#### TASK SUMMARY

	Hours	Amount
L110 - Fact Investigation/Development	303.2	139,277.90
A101 - Plan and prepare for	2.5	1,406.25
A102 - Research	10.1	5,504.85
A103 - Draft/revise	31.0	12,898.35
A104 - Review/analyze	173.1	78,038.95
A105 - Communicate (in firm)	26.8	13,524.15
A107 - Communicate (outside counsel)	4.0	1,916.80
A108 - Communicate (other external)	52.3	24,700.80
A109 - Appear for/attend	1.3	731.25
A110 - Manage data/files	0.7	185.50
A111 - Other	1.4	371.00
L120 - Analysis/Strategy	396.4	198,280.90
A101 - Plan and prepare for	8.0	4,262.00
A102 - Research	7.5	2,396.95
A103 - Draft/revise	12.1	4,638.80
A104 - Review/analyze	128.0	48,573.75
A105 - Communicate (in firm)	119.8	65,062.20



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A107 - Communicate (outside counsel)	28.6	18,948.70
A108 - Communicate (other external)	78.3	47,802.50
A109 - Appear for/attend	14.1	6,596.00
L140 - Document/File Management	29.4	8,164.25
A110 - Manage data/files	0.5	361.25
A111 - Other	28.9	7,803.00
L150 - Budgeting	0.1	56.25
A108 - Communicate (other external)	0.1	56.25
L190 - Other Case Assess, Develop, Adm	8.1	2,146.50
A103 - Draft/revise	7.3	1,934.50
A108 - Communicate (other external)	0.8	212.00
L210 - Pleadings	82.8	35,867.45
A103 - Draft/revise	73.3	31,103.30
A104 - Review/analyze	5.3	2,590.65
A105 - Communicate (in firm)	2.3	1,155.15
A107 - Communicate (outside counsel)	1.5	843.75
A108 - Communicate (other external)	0.4	174.60
L220 - Prelim Injunctions/Prov Remedies	1.4	749.70
A104 - Review/analyze	1.0	524.70
A105 - Communicate (in firm)	0.1	56.25
A108 - Communicate (other external)	0.3	168.75
A109 - Appear for/attend	0.0	0.00
L250 - Other Written Motions/Submission	0.4	174.60
A103 - Draft/revise	0.4	174.60
L330 - Depositions	19.4	8,657.10
A101 - Plan and prepare for	1.2	523.80
A103 - Draft/revise	7.0	3,194.10
A104 - Review/analyze	3.6	1,584.00
A105 - Communicate (in firm)	0.6	299.70
A108 - Communicate (other external)	0.0	0.00
A109 - Appear for/attend	7.0	3,055.50
L390 - Other Discovery	7.3	2,730.29
A103 - Draft/revise	0.7	393.75
A107 - Communicate (outside counsel)	0.1	43.65



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A111 - Other

6.5

2,292.89

848.5

\$396,104.94

## EXPENSE SUMMARY

Description	Amount
Filing Fees	5,080.20
Federal Express	827.59
Courier and Messenger Service	125.00
1 year website subscription approved by Robin Weiss. Initially signed up with GoDaddy but later decided to change the hosting provider to Weebly. Website <a href="https://empireholdingsgroupreceivership.com/">https://empireholdingsgroupreceivership.com/</a> - Misc - Other	155.52
Court Fees	52.00
EDiscovery Hosting Services - per GB	114.15
<b>Total</b>	<b>\$ 6,354.46</b>

## EXPENSE DETAIL

Date	Description	Amount
09/23/24	Federal Express Tracking # 279801833696 Ship Dt: 09/23/24 Ship To:	18.80
09/23/24	Federal Express Tracking # 279802772220 Ship Dt: 09/23/24 Ship To:	18.80
09/23/24	Federal Express Tracking # 279830175050 Ship Dt: 09/23/24 Ship To: Clerk of Court	12.06
09/23/24	Federal Express Tracking # 279830512273 Ship Dt: 09/23/24 Ship To: Clerk of Court	14.19
09/23/24	Federal Express Tracking # 279830793309 Ship Dt: 09/23/24 Ship To: Clerk of Court	21.48
09/23/24	Federal Express Tracking # 279831426300 Ship Dt: 09/23/24 Ship To: Clerk of Court	12.06
09/23/24	Federal Express Tracking # 279802318037 Ship Dt: 09/23/24 Ship To:	23.61
09/24/24	Federal Express Tracking # 279861395402 Ship Dt: 09/24/24 Ship To:	23.61
09/26/24	Federal Express Tracking # 279693918400 Ship Dt: 09/26/24 Ship To: Clerk of Court	32.19
09/26/24	Federal Express Tracking # 279695533159 Ship Dt: 09/26/24 Ship To: Clerk of Court	27.62
09/26/24	Federal Express Tracking # 279695539455 Ship Dt: 09/26/24 Ship To: Clerk of Court	17.73
09/26/24	Filing Fees \$52.00 - 09.26.2024 - FILING FEE - PAY.GOV WESTERN DISTRICT COURT # APAWDC-8475569 - MATTER# 501765 - Filing Fees - Court	52.00

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09/30/24	Filing Fees	52.00
09/30/24	Filing Fees	52.00
09/30/24	Filing Fees	52.00
<del>09/30/24</del>	<del>Filing Fees</del>	<del>52.00</del>
<del>09/30/24</del>	<del>Filing Fees</del>	<del>52.00</del>
10/01/24	Federal Express Tracking # 280131501656 Ship Dt: 10/01/24 Ship To: kathleen phy	23.17
10/01/24	Federal Express Tracking # 280141788058 Ship Dt: 10/01/24 Ship To: Douglass S. Lodmell	24.52
<del>10/02/24</del>	<del>Federal Express Tracking # 280182503980 Ship Dt: 10/02/24 Ship To: The Honorable Stacey D. Adams</del>	<del>21.90</del>
10/08/24	Federal Express Tracking # 280382528946 Ship Dt: 10/08/24 Ship To:	23.61
10/08/24	Federal Express Tracking # 280382837147 Ship Dt: 10/08/24 Ship To:	18.80
10/08/24	Federal Express Tracking # 280382975633 Ship Dt: 10/08/24 Ship To:	18.80
10/10/24	Federal Express Tracking # 280488152686 Ship Dt: 10/10/24 Ship To: Clerk of Court	23.61
10/10/24	Federal Express Tracking # 280488738715 Ship Dt: 10/10/24 Ship To: Clerk of Court	12.06
10/10/24	Federal Express Tracking # 280489155800 Ship Dt: 10/10/24 Ship To: Clerk of Court	29.09
10/10/24	Federal Express Tracking # 280489629276 Ship Dt: 10/10/24 Ship To: Clerk of Clerk	24.52
10/10/24	Federal Express Tracking # 280489954080 Ship Dt: 10/10/24 Ship To: Clerk of Court	16.63
10/10/24	Federal Express Tracking # 280501244534 Ship Dt: 10/10/24 Ship To: Douglass S. Lodmell	24.52
10/10/24	Federal Express Tracking # 280501631318 Ship Dt: 10/10/24 Ship To: Clerk of Court	23.61
10/10/24	Federal Express Tracking # 280501801582 Ship Dt: 10/10/24 Ship To: Clerk of Clerk	24.52
10/10/24	Federal Express Tracking # 280502081871 Ship Dt: 10/10/24 Ship To: Clerk of Court	29.09
10/10/24	Federal Express Tracking # 280502287956 Ship Dt: 10/10/24 Ship To: Clerk of Court	12.06
10/10/24	Federal Express Tracking # 280502577313 Ship Dt: 10/10/24 Ship To: Clerk of Court	16.63
10/11/24	Federal Express Tracking # 279691127043 Ship Dt: 10/11/24 Ship To: Clerk of Court	24.68
10/11/24	Federal Express Tracking # 279693565357 Ship Dt: 10/11/24 Ship To: Clerk of Court	23.97
10/11/24	Federal Express Tracking # 279694380222 Ship Dt: 10/11/24 Ship To: Clerk of Court	20.49
10/11/24	Federal Express Tracking # 280541848231 Ship Dt: 10/11/24 Ship To:	23.61
10/17/24	Courier and Messenger Service	125.00



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10/17/24	1 year website subscription approved by Robin Weiss. Initially signed up with GoDaddy but later decided to change the hosting provider to Weebly. Website <a href="https://empireholdingsgroupreceivership.com/">https://empireholdingsgroupreceivership.com/</a> - Misc - Other	155.52
10/22/24	Court Fees COURT FEES NTC OF FILING AT U.S. DISTRICT COURT	52.00
10/22/24	Filing Fees FILING NTC OF FILING AT U.S. DISTRICT COURT	88.20
10/23/24	Federal Express Tracking # 280993320196 Ship Dt: 10/23/24 Ship To:	23.72
10/30/24	EDiscovery Hosting Services - per GB EDiscovery Hosting Services - per GB	114.15

**Total****\$ \$6,354.46**